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Summary of Public Submissions

ONTARIO HERITAGE POLICY REVIEW

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ONTARIO HERITAGE POLICY REVIEW

SUMMARY OF PUBLIC SUBMISSIONS

Ministry of Culture and Communications
Ontario Heritage Foundation

April 1988

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ISBN 0-7729-4091-6

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ONTARIO HERITAGE POLICY REVIEW

SUMMARY OF PUBLIC SUBMISSIONS

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1.0 INTRODUCTION

This report seeks to summarize the rich array of comments, observations and recommendations submitted in the form of oral presentations and written briefs to the Ontario Heritage Policy Review from members of the public, heritage organizations and associations, provincial, national and international representative bodies, municipalities, and provincial and federal government agencies. As such, it is purely a descriptive report of the range of opinion expressed by these various members of Ontario's heritage community. It should be noted that this report does not constitute a statement of government policy or position.

1.1 BACKGROUND

On February 16, 1987, the Hon. Lily Oddie Munro, then Minister of Citizenship and Culture, launched the Ontario Heritage Policy Review. In making the announcement, the Minister indicated the review would take a broad view, seeking to establish an overall policy framework within which the government as a whole could plan, implement and evaluate future programs and initiatives in the field of heritage conservation. The Minister also spoke of the need to shape a common vision to guide heritage conservation into the next century.

In April the review process began with the release of the Discussion Paper, Heritage: Giving Our Past a Future. From early May until late June a series of 26 public meetings were held in representative locations across the province. Total attendance at the meetings was slightly over 1000 - from a high of 200 in Toronto to 5 in Hearst - representing a broad range of heritage interests and organizations. After the meetings individuals and organizations were encouraged to submit written letters or briefs.

1.2 BREAKDOWN OF PUBLIC RESPONSES

In all, just under 250 written submissions were received over the period of the last six months of 1987. These varied from one page letters to thirty page briefs, and represented such diverse interests as those of individual citizens, elected governments, newly formed volunteer groups and well-established associations with memberships as high as 20,000. The disciplines or constituencies represented among the responses also varied greatly, from architectural conservation, natural heritage and archaeology, to such interests as arts heritage preservation and "intangible" or non-physical heritage.

Exhibit 1.0 shows the number of submissions categorized by specialized group or type of respondent. The complete listing of submissions appears in Appendix D.

1.3 ORGANIZATION OF THE REPORT

The remainder of the report is organized under two chapters. Chapter 2.0 summarizes the major themes and recommendations derived from the entire body of presentations and submissions. Chapter 3.0 organizes these comments and recommendations according to the specialized group or constituency from which the submissions came, and allows for comparison of priorities and concerns across groups (eg. museums, archives, LACAC's, municipalities, etc.). In each constituency summary, submissions from relevant provincial or federal agencies and from representative provincial, national or international associations have been highlighted separately.

Exhibit 1.0 Breakdown of Responses by Specialized Group

Specialized Group	No. of Submissions[*]	Prov/Nat'l/Intn'l Associations	Prov/Fed Agencies
Municipalities	16[#]	Assn. Municipalities Ont.	
LACACs	29		
Historical Socs.	12	Ont. Historical Society	
Heritage Orgs.	11		
Archives	18	Ont. Genealogical Soc.[+]	
Arts Heritage	10	Ont. Assn. Art Galleries Assd. Designers Canada Cdn. Theatre Critics Assn. Coalition Arts Heritage Pres.	Ont Arts Council Art Gallery Ont.
Museums	31		Nat'l. Mus. Sci. Tech. Ont. Place (HMS HAIDA) St. Lawrence Pk Comm. (Ft. Henry, Upper Cda. Village, Fairfield)
Archaeology	24	Ont Archaeological Soc.[+] Ont. Council Archaeology Ont. Council Prof Osteologists Ont Marine Heritage Com. Save Ont. Shipwrecks	
Natural Heritage	15	Conservation Council Ont. Fed. Ont. Naturalists Natural Heritage League	Royal Botanical Gdns. Niagara Escarpment Comm.
Non-Physical Heritage	32	Multicult. History Soc. Ont. Black History Soc. Ont Folklife Centre Ont. Folk Dance Assn. Folklore Studies Assn. Cda.	
Other:			
- Associations	6	Architectural Conserv. Ont.[+] Cdn. Inst. Pub. Real Estate Co. Ont. Assn. Landscape Architects ICOMOS IIC-CG	
- Individuals	43		
Total[o]	247[*]		

[*] Total includes submissions from Prov/Fed Agencies, and from Prov/Nat'l/Intn'l Associations and branches/chapters

[+] Includes submissions from regional/local branches

[#] Includes two LACAC submissions.

[o] As at December 31, 1987

Within each chapter and subsection, public comments and recommendations are summarized under the relevant questions posed by the Discussion Paper, Heritage: Giving Our Past a Future. Appendix A contains the Executive Summary from the Paper, in which the thirteen questions are outlined. The questions pertain to such issues as defining the boundaries of the heritage movement, clarifying roles and responsibilities of the various government and non-government players, identifying gaps and inconsistencies in our approach to heritage conservation, reducing conflict and increasing communications and cooperation, among others.

In light of the open-ended nature of the Discussion Paper questions, it was not appropriate to assign statistical weight to the responses; however, where certain viewpoints were widely shared, or particular recommendations frequently raised, these have been indicated. Quotes from various submissions have been used throughout the report both to illustrate prominent ideas, issues and themes, and to represent individual or unique opinions and recommendations. Readers interested in reviewing any or all referenced submissions may do so by contacting and arranging to visit any of the Regional Offices of the Ministry of Culture and Communications (list of offices - Appendix E).

The report has tried to incorporate as many of the opinions, observations and recommendations contained in the submissions as possible. There has been no attempt in the context of this report to comment on the feasibility or validity of any of the recommendations raised, nor to draw conclusions with respect to government policy or program directions. Work on such analysis of policy and program options has proceeded parallel to the preparation of this report and will inform the next phase of consultation.

Because the description of public input is presented in summary form, and due to the volume of material involved , it is likely that some points have been unintentionally omitted. For example, comments concerning measures that are already provided for in existing legislation and programs have not been included. Over the course of the Heritage Policy Review, however, we are confident that the positions held by general and specific interest groups will have been assessed, and will have contributed significantly to the formulation of conclusions and final recommendations.

Finally, the list below explains the most commonly used acronyms throughout the report.

CRB - Conservation Review Board
LACAC - Local Architectural Conservation Advisory Committee
MCC - Ministry of Culture & Communications (formerly Ministry of Citizenship & Culture)
MNR - Ministry of Natural Resources
MTR - Ministry of Tourism & Recreation
OHA - Ontario Heritage Act
OHF - Ontario Heritage Foundation
OMB - Ontario Municipal Board

2.0 SUMMARY OF COMMENTS AND RECOMMENDATIONS

Taken together, the comments and recommendations contained in the public submissions represent a highly informed and important set of opinion relative to the principles, themes and questions raised by the Discussion Paper.

These responses are summarized under each of the relevant Discussion Paper questions in the sections that follow. A more detailed reporting of what was said by each of the specialized interest groups and constituencies (LACACs, Museums, Archaeology, and so forth) is contained in Chapter 3.0.

Clearly, many of the concerns and priorities for action differ across the disciplinary boundaries of the heritage community. At the same time, underlying these various agendae are some strong areas of agreement; namely, that:

- The conservation of our heritage in all its forms contributes to the quality of our lives and our environment, and is therefore worthy of a higher public profile and commitment;
- Much excellent work has been accomplished but more can be done at all levels of involvement: individual, community and government. We must promote a collective responsibility for heritage conservation, strengthen our current efforts and build on our achievments; and

- There are serious "gaps and inconsistencies" in our legislation, in the definition and division of responsibilities for heritage conservation, and in the availability of resources, which have resulted in uneven levels of achievement in the protection of heritage resources across the province, and in some cases, irrevocable losses. A Heritage Policy must address these gaps and inconsistencies.

The strength of the public submissions lies in the fact that they have gone beyond the articulation of problems, gaps and weaknesses to provide a comprehensive set of proposals and options for legislative improvement, policy and program development. While it is impossible in a report of this nature to do justice to the degree of detail in the written briefs, the summaries that follow point to the broader directions and recommendations that have been put forward.

2.1 DISCUSSION PAPER QUESTIONS

2.1.1 Are there gaps and inconsistencies in our approach to heritage conservation in Ontario and, if so, how can they be addressed?

As one of the most controversial of the Discussion Paper questions, this raised a host of concerns and criticisms with respect to gaps and inconsistencies in legislation and in government policy, in program delivery and funding, and in what might be described loosely as information or knowledge about the extent and nature of heritage resources.

- **Legislative and Policy Gaps and Inconsistencies**

Key concerns regarding legislation centred both on perceived weaknesses in the Ontario Heritage Act, and on certain inconsistencies between the Act and other statutes affecting heritage conservation.

Amendments to the Ontario Heritage Act (OHA) have been proposed by a number of bodies over the last ten years; most notably by the Association of Municipalities of Ontario, the Ontario Historical Society, the City of Ottawa and the Toronto Historical Board. Both procedural and policy matters have been addressed in these various proposals, and in the public submissions to the Heritage Policy Review the need for amendments to the OHA was strongly reiterated.

On procedural matters, various submissions argued for streamlining and clarifying the existing designation process for individual properties and heritage conservation districts. Among those most often mentioned were proposals to :

- clarify responsibilities, content and timing of the various notices required under the Act;
- reduce the number of required published notices from three to one;
- remove requirements for hearings of the Conservation Review Board and Ontario Municipal Board where objections are withdrawn prior to scheduled hearings, or where there are no objections to the designation;
- extend the application period for OMB approvals regarding heritage conservation districts;

- define in more detail the types of alterations permitted or prohibited under the Act (eg sandblasting); and

- allow for the designation of individual properties falling within a heritage conservation district.

The Ontario Heritage Act was also seen as the vehicle by which to address a host of broader policy questions regarding the protection of heritage resources. Indeed, a first step, in the view of many, will be to outline in detail in the Act the greater range of resources which should be given legal protection.

The question of responsibility for designating provincially and federally-owned heritage properties was widely debated. At the very least, it was felt to be a provincial responsibility, while many argued for some arrangement to allow municipalities to undertake this role.

One of the most contentious issues in this discussion was the lack of legal authority to prevent the demolition of heritage properties designated under the Act. Currently, municipalities may delay demolition for a total of 270 days, but may not prohibit it. While some felt the province should retain the authority to prevent demolition of designated properties (and in particular those of provincial or national heritage significance), most of those addressing the issue argued for an expansion of municipal powers to control or prevent demolition of designated structures.

In general the adequacy of protection for heritage resources under the current Act was the subject of considerable criticism. Better enforcement procedures and the ability to prosecute for violations under the Act, without the necessity of Ministerial approval, were considered crucial.

Finally, with respect to gaps in the heritage legislation, the question of an effective mechanism to appeal municipal decisions regarding designation was raised. The current appeal body, the Conservation Review Board, was felt to be too limited in scope and was criticized for its lack of legal authority to make binding decisions. Indeed, many felt that no further powers should be given to municipalities without an effective appeal process, similar to that under the Ontario Municipal Board.

Inconsistencies between the Ontario Heritage Act and other statutes affecting heritage conservation were widely noted. Of most concern were requirements or provisions in the Building Code and Assessment Act that override the OHA and are considered to be counterproductive to good conservation practice. It was felt, for example, that the Assessment Act should not penalize those whose properties realize an additional value as a result of heritage designation and restoration. And where Building Code requirements would seriously reduce the architectural and historical significance of a building, a waiver of such requirements should be available under the Heritage Act.

An alternative, or an additional, legislative vehicle suggested for realizing heritage conservation goals was the Planning Act. It was argued that this Act should acknowledge and reference the fact that considerations regarding historic architectural features, the placement of buildings within heritage conservation districts, and actions necessary to properly restore heritage structures may not necessarily meet zoning by-law and other statutory requirements; thus, the Planning Act should allow for variances to expedite the development and responsible use of designated structures. Under this Act, it was further argued, policies and guidelines should be established such that land-use planning would explicitly address both new development and heritage conservation considerations.

Other policy inconsistencies or gaps were noted, often with respect to somewhat more specialized interests or discipline-specific issues. Whether the Ontario Heritage Act could or should be used to address these was often the subject of debate. Specific examples included the inadequacy of legislation and policies governing archives, and the need for improved coordination between government agencies regarding the excavation of unmarked graves, native burial sites, and underwater archaeological resources.

- **Public Funding/Program Gaps**

The perceived adequacy of public funding for heritage conservation was one of the predominant issues arising from the public submissions. The province, it was felt, should reaffirm its commitment to heritage conservation not only through the provision of leadership and facilitation, but through sustained financial support.

The need for public funding in all areas of heritage conservation was described as pervasive, and was of particular concern to small communities whose alternative sources of funding are limited. In many cases, it was a question of expanding existing granting programs and advisory services provided by the Ministry for architectural restoration, museum development and archaeology. Other groups such as archives, art galleries, and ethnocultural organizations argued for formal consideration and new funding programs for their heritage conservation services and activities.

Another aspect of funding programs that received attention was the question of accessibility and the adequacy of program delivery in remote areas of the province. Access to expertise, advisory and technical services (including training opportunities) was problematic for many groups, from LACACS and municipal staff, to local heritage organizations and the museum and archives communities. Many submissions also made general reference to the need for better public information about heritage programs, funding and resources.

- **Information Gaps**

The issue of information needs in the heritage field took expression in a variety of proposals, from the most complex -- automated systems and networks linking heritage organizations and practitioners, to the most basic -- directories, sourcebooks and newsletters. The notion of an information clearing house was often raised as a possible role for the Ministry.

Judging from the number of comments, a high priority was the need for a province-wide register of historic and/or architecturally significant properties and sites, similar to the National Register in the United States. Such a listing was seen to serve a number of purposes, from information for planning and designation, to a classification scheme for programs of assistance, which could be geared to the degree of importance or significance of the registered structure or site. As with archaeological resources (for which, it was often noted, there is inadequate survey information) an understanding of the extent of our resource base is crucial for conservation planning and management.

2.1.2 Is the current division of responsibilities for conserving heritage properties the most effective and desirable?

To what extent and in what respects should municipalities have a central role to play in heritage conservation?

The majority of comments in response to these Discussion Paper questions centered not as much on changing the current division of responsibilities, as upon strengthening the existing roles of municipalities and the province in heritage conservation.

The principle of decentralization of heritage conservation responsibilities which underlies the Ontario Heritage Act was widely supported, but equally strong was the view that any further devolution should not detract from the "essential provincial role" of support, leadership, facilitation and the channelling of appropriate funding.

It was often noted that while decisions regarding heritage resources ought to be made at the "level of government nearest to the people", the practical realities of financial constraints and other political imperatives has often meant that local heritage concerns are of low priority. This is a particular problem in some small municipalities and northern communities. Again, a strong case was made for entrenching heritage conservation as a formal consideration in the municipal planning process by elaborating policies for the protection of heritage resources (both natural and built) under the Planning Act.

While there were numerous examples of good conservation practices and cooperative achievments among organizations and governments at a local and regional municipal level, many instances were described where an adversarial situation had developed between "unsympathetic" Councils and community interests in heritage conservation. Many felt they could not compete with "powerful developers and the prospect of increased tax revenues", and called for more stringent planning guidelines where heritage sites were being considered for redevelopment.

A stronger role for the Ontario Heritage Foundation, particularly in the area of program funding, was the subject of some discussion. A variety of other possible functions was contemplated for the OHF or for a newly constituted provincial body, including a trust function similar to that carried out by Britain's National Trust; a coordinating function for cultural heritage interests, modelled on the Natural Heritage League; and a role as a central coordinating body or association for LACAC's.

2.1.3 What steps could be taken to increase communications and cooperation among the various public and private-sector players currently active in heritage conservation in Ontario?

What steps can be taken to extend the boundaries of the heritage movement to include groups and individuals not previously involved?

In response to the questions of increasing cooperation and involvement of groups and individuals in heritage conservation, a great deal of importance was attached to improving communications and coordinating efforts both within and across specialized fields of heritage conservation activity.

It was widely felt that a broader working definition of heritage is needed, both to recognize the importance of "non-traditional" heritage sectors and to extend equal status and support to heritage conservation efforts involving the built environment, natural resources, material culture, and "intangible" or non-physical components such as behaviours, traditions, and values.

Another strongly expressed view was the need to improve intergovernmental coordination of policies, programs and practices regarding heritage resources under provincial and federal ownership or jurisdiction. While cooperative efforts involving government agencies and non-governmental sectors in natural heritage conservation (for example, the National Heritage League) were widely praised, it was felt that more could be accomplished in such fields as heritage education and tourism development through interministerial planning and cost sharing.

On a local and regional basis, there was considerable interest in strengthening organizational networks to improve communications and the delivery of heritage programs and services. Proposals included local heritage committees or councils, regional-level cooperatives and networks, and facilities such as conservation centres serving a number of heritage interests and organizations. A system of local and regional archives was discussed. The merits of automated information networks for sharing news, studies and reports, databanks and software were also debated. Underlying these various proposals was a widespread interest in linking the resources and efforts of heritage groups and practitioners, improving access to information across the province, and increasing the overall quality of heritage conservation activities and operations.

2.1.4 What steps could be taken to reconcile conflicting interests in the conservation of heritage properties in Ontario?

How can the resources and efforts of the private sector -- both for-profit and not-for-profit -- be effectively used in furthering heritage conservation in Ontario?

With respect to the conservation of heritage properties, and engaging the resources of the private sector generally, there was a heavy emphasis in the public submissions on the need for more effective and positive inducements. It was widely felt that the resources and involvement of the private sector, particularly property owners and developers, could be secured more effectively if the economic benefits of heritage conservation were more obvious.

Pointing to the experience in other jurisdictions, and particularly in the United States, many submissions argued for measures to "untax" heritage by removing tax disincentives to property restoration and adaptive re-use. Equally numerous were proposals to provide positive tax incentives at all levels -- from property and sales tax exemptions and credits for heritage restoration projects and materials, to income tax write-offs for capital contributions and donations of labour.

Other proposed measures to encourage the preservation or re-use of heritage properties and the protection of sites and natural areas included a broad range of non-tax incentives: increased grants and matched funding programs; loans, revolving funds and trusts; greater use of easements and stewardship arrangements; and the ability to provide transfers of development rights.

On another level, it was also considered very important to promote heritage conservation among developers, planners and property owners through the provision of better information about the benefits, opportunities and economic value of conservation measures, and by recognizing private sector efforts in heritage conservation with awards and honours.

2.1.5 By what means could greater public awareness of heritage be achieved at both the community and provincial levels?

A common theme throughout the submissions was the need for a concerted and imaginative approach to raising public awareness and support for heritage conservation.

It was felt to be especially important to reach children and young people through a greater emphasis on heritage education and "hands-on" experiences within the formal school curriculum. Support was urged for local heritage organizations and institutions in providing such educational programs and opportunities in their communities; the Ministries of Culture and Communications,and Education moreover, were asked to develop educational materials and better heritage programs for use in elementary and secondary schools.

Informal public education was considered to be equally important. More project funding for publishing local histories and for celebrating heritage events and festivals was encouraged, but a much greater effort was urged from the Ministries of Culture and Communications, Tourism and Recreation, and Transportation in promoting heritage conservation province-wide. This could include a variety of approaches, from a "Participaction"-type campaign for heritage conservation, to the promotion of historic sites and areas with brochures, maps, and better road and highway signs. Greater use of pilot and demonstration projects was also encouraged, such as the restoration/rehabilitation of a designated property, or the establishment of an "eco-museum" comprising all the heritage organizations, institutions and facilities, structures and sites in a given community or region.

2.1.6 How can heritage conservation serve as a greater stimulant to tourism in Ontario?

Many were supportive of planning for tourism, and the designation of tourist routes or areas with the cooperation of the Ministry of Tourism and Recreation. Small communities in particular felt that their heritage resources and attractions had been overlooked in the marketing and promotion of Ontario as a tourist destination. More assistance was called for to publicize the tourism potential of small communities, and cooperative efforts among local museums, historic sites, galleries, theatres as well as restaurants and hotels were encouraged.

While it was acknowledged that Ontario's heritage could be more effectively incorporated into the tourism development of the province, there was also some concern that it not be exploited primarily for commercial gain. It was noted widely that increased tourist traffic and tourist needs can conflict with the protection and preservation of the very heritage resources that provide the attraction.

2.1.7 What measures could be taken to strengthen professional training and educational opportunities?

A significant concern among museums, archives and archaeological professionals and practitioners was the need for more (and more accessible) professional development opportunities. Programs such as those currently offered by the Ontario Historical Society, Ontario Museum Association and the Ontario Association of Archives were praised, but a problem facing many professionals working in small or remote communities was described as one of affordability and accessibility.

It was felt that opportunities for volunteer training, particularly in the museums and archaeological fields could be expanded, but there was also concern that there may be too great an emphasis on volunteer labour in the heritage professions. Volunteers, it was agreed, must be considered as a means to enrich the practice of heritage conservation, rather than an operating substitute for paid, full-time positions.

The scope and availability of entry-level (formal post-secondary and graduate) training in Ontario universities was often critized as inadequate, particularly in the fields of heritage resource management, architectural restoration, and archival and archaeological studies. Many also felt that the whole question of job opportunities and salary levels ought to be re-examined, if the heritage professions are to attract qualified, experienced people.

The question of opportunities for newly trained workers was also examined. Many small archives, museums and galleries have found it difficult to afford to hire interns, even with cost-sharing from the government, and proposed more flexible part-time or revolving internship arrangements.

Finally, a significant problem facing many municipalities in carrying out heritage conservation responsibilities was variously described as a shortage or lack of access to technical resources, training and expertise in heritage resource management. A variety of solutions were proposed, from workshops and courses for municipal representatives and LACAC members, to an expanded and decentralized technical advisory service from the province.

2.1.8 How can we manage the new information technologies to assist in heritage conservation in Ontario?

Apart from the potential for automated heritage information networks noted earlier, there was relatively little commentary on the application of information technology to heritage conservation. The possibility of documenting and storing on tape or video format the unwritten or unpublished aspects of our heritage -- song, dance, folklore and languages, was raised. A number of submissions also urged greater involvement of TV-Ontario in the production and broadcasting of heritage educational programming.

2.1.9 What steps could be taken to integrate heritage resources and activities with community interest in such spheres as health, education, the environment, the economy and so forth?

In reviewing the principles set out in the 1972 World Heritage Convention what implications arise for future heritage conservation efforts in Ontario?

This last set of Discussion Paper issues raised the observation that our commitment to the principles of the World Heritage Convention implied a much stronger obligation and more active effort to integrate heritage considerations into policy-making and planning processes at all levels. The interrelationship between Ontario's cultural heritage and natural environment was also widely noted, and reflected the World Heritage Convention's recognition of sites of both natural and cultural significance. The large number of comments regarding the need for heritage interests to be consistently and effectively entrenched in the planning legislation, and in community development processes, strongly affirmed these principles.

3.0 RESPONSES BY SPECIALIZED GROUPS

Each of the sections that follow provides a detailed summary of responses organized by specialized group or constituency. Submissions from relevant provincial or federal agencies, as well as provincial, national or international associations, are highlighted at the end of each section.

3.1.0 MUNICIPAL/REGIONAL GOVERNMENT

A small but varied group of municipal bodies made representations to the Heritage Policy Review. These ranged from a county and a regional municipality, through to a number of cities, towns, and townships, as well as local library and recreational boards. The vast majority of these submissions came from communities located in southwestern and central Ontario.

Municipalities were strongly supportive of heritage conservation in their communities but almost without exception, were frustrated by the limitations on the availability of financial and technical resources needed to implement heritage projects and programs. Recommendations focused on the necessity of a stronger provincial funding commitment in all areas of heritage conservation.

3.1.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

A strong message was delivered by municipalities who feared that heritage conservation projects and programs would continue to suffer through lack of funding.

> ...we as a municipality are financially limited in the types of heritage initiatives with which we are able to get involved. Our tax base is fixed, and as such we must pick and choose carefully between projects, particularly when those projects are capital intensive. In the recent past, we as a municipal Council were faced with a most difficult dilemma - the decision as to whether the municipality should become involved with the preservation of the facade of the White Building, a building of architectural significance to Windsor's downtown area. In the final analysis, the decision was made to demolish the remains of the facade because we simply could not afford the exorbitant costs associated with dismantling the facade brick by brick, storing it, and ultimately rebuilding the facade in another location some time in the future. From a fiscal point of view, it was the only responsible decision that we as a City council could make given the circumstances.
>
> (City of Windsor)

Other concerns centred on the lack of commitment for the preservation of "main streets" or older downtown sections of the cities, as well as buildings and sites of broad provincial or national heritage significance. In some cases, amendments to the Ontario Heritage Act were suggested both to strengthen the authority of municipalities to act, and to improve the procedures for designating heritage properties. Currently, many of the required procedures are costly in terms of time and resources, and act as disincentives to heritage conservation. Key recommendations regarding designation procedures included:

- extending municipal control over the future disposition of designated properties (e.g. permanent designation);
- prohibiting the demolition of designated properties until a permit has been issued for a new building on the site;
- waiving the published notice requirement for designation of properties under the Act with the property owner's consent; and/or,
- reducing the required number of published notices regarding designation to one;

- providing for the cancellation of Conservation Review Board hearings if an objection is withdrawn prior to the hearing date; and
- devising a less onerous (and less costly) method of describing heritage structures on large rural properties other than a complete survey and reference plan.

In the view of some municipalities, it would also be appropriate for the province to assume responsibility for the designation and protection of sites and structures (such as court houses, early buildings and homes) having broad provincial or national heritage significance, regardless of the attitude of the local Council or property owner. To accomplish this, the province was urged to take a lead role in identifying and creating an inventory of significant sites, and to designate all provincial and federal buildings within a given period of time, in consultation with the relevant municipalities.

The need for a greater provincial funding commitment to assist municipalities and community-based organizations in heritage program delivery was raised in many municipal briefs. A particular concern was the tendency for over-reliance on the efforts and dedication of volunteers.

> If the Province is dedicated to creating a policy framework... then one must address the question of human resources. Quite simply, many municipalities do not have technical expertise or staff time to dedicate to enriched programs of heritage preservation. On the other hand, municipalities and the Province cannot continue to rely exclusively on volunteers in the community to sustain the momentum for heritage preservation in local areas. While we agree that local interests are best looked after at the municipal level, we would support the creation of Provincial Heritage Resource Centres located within municipalities, with locally-based staff who could provide assistance to the community undertaking heritage initiatives.
>
> (City of Windsor)

Municipalities also saw a need for strengthened or expanded program funding in key heritage conservation fields. Specific recommendations included:

- an ongoing program of operating grants for archaeological identification and site development;
- sustaining funding for archives, together with the development of operating standards and guidelines;
- financial assistance for art galleries promoting heritage themes and exhibits; and
- increased funding for museums on a percentage basis of budgets, with special assistance for skills training and organizational development, audio-visual programming and multi-language promotion, and technical advice;

ii) Current Division of Responsibilities

In general municipalities tended to re-affirm the current division of responsibilities for heritage conservation, while stressing the need for improved communication and cooperation.

> The heritage movement in Ontario in 1987 faces major challenges, among them being the process in determining who should be responsible for what. In determining the most effective division of responsibility (financial and otherwise) between various levels of government, the emphasis in Ontario has been on decentralized partnerships. This relates to the long-standing political tradition in the Province that, in most instances, programs ought to be implemented and administered at the level of government nearest to the people. This implies that the Province might provide an overall framework, guidance, leadership and support aimed at increasing the capacity and self-proficiency of local heritage resources and the direct implementation of programs would remain at the municipal level. Needless to say, co-ordinating heritage concerns with other Ministries and increasing public awareness of heritage are most important to the City.
>
> (City of Windsor)

Other municipalities felt it was important to articulate local priorities and strategies for heritage conservation through the development of municipal heritage policies:

> Municipalities have a central role to play in heritage conservation. The province and the federal government have a leadership role to play in the development of standards for heritage conservation, the development of policy and as funding sources. Although the definition of heritage will vary from municipality to municipality we recommend that the province encourage each Ontario municipality to establish an official heritage policy unique to the municipality's history, heritage resources, and expressed interests.
>
> (City of Mississauga)

Finally, there appeared to be some confusion over the role of the Ontario Heritage Foundation vis-a-vis the province, the federal government and municipalities. A number of possible functions was suggested, including a coordinating role to improve communications among heritage organizations, and a legislative review function to ensure consistency of provincial statutes regarding heritage conservation.

The concern for coordinating efforts at all levels prompted one municipality to comment:

> There is a lack of co-ordination of programs and services for Culture, Recreation, Heritage and Tourism i.e. LACAC, Recreation Board, Museum, Library - at the local level. These groups could get together on a regular basis to share information and avoid duplication of services.
>
> (Goderich Recreation and Community Centre Board)

This brief concluded that there was a similar need at the provincial level for ensuring a consistent policy among the various Ministries having interests in heritage, and for providing better information about available programs and government grants. As well, it was recommended that the Ministry of Culture and Communications consider the decentralization of its Heritage Branch by locating heritage staff in Ministry offices throughout the province. This would serve not only to facilitate the implementation of provincial heritage policy and standards, but also to provide more expertise at the regional level.

iii) Resources and Efforts of the Private Sector

While recognizing that the private sector was a largely untapped source of support for heritage conservation, most comments were directed specifically toward the need to increase incentives for architectural preservation by property owners.

One municipality noted that interest by property owners in designation increased with the introduction of BRIC grants in 1983. By the same token, nearly half of the thirty-two designated properties in this municipality in private ownership have never received a grant. It appeared that "many owners are genuinely interested in the future preservation of their property and are motivated by the protection and recognition which are a part of the designation as well as the available grants".

At the same time, the BRIC program and its successor, Preserving Ontario's Architecture, were praised and suggestions were made as to how to improve and simplify the funding procedure for designated properties. In particular, it was recommended that:

- Under the Preserving Ontario's Architecture program, the Commercial Rehabilitation Grant maximum of $150,000 should be amended to allow for full funding in those extraordinary instances where an important and large historical building should be preserved;
- The condition on title of any grant made under the foregoing program should be removed to eliminate the problem with other funding which necessitates clear title. An alternative approach could stipulate recovery of the grant on an annually declining basis over a certain number of years if the property is sold;
- The provision for "piggy back" grants and loans under any combination of federal and provincial programs should be permitted up to a maximum of 75% of rehabilitation expenditures incurred.

(Town of Kapuskasing)

"Knowledge, communication and education" were considered crucial to reconciling conflicting interests in the conservation of heritage properties. The province,in its leadership role, was urged to provide municipalities with relevant studies and information on such topics as conservation methods, and the economic rationale for adaptive reuse, restoration and renovation of heritage properties. One solution to the apparent lack of available research on architectural conservation, it was added, might be the development of an "Ontario Heritage Research Documentation Centre."

Finally, tax incentives (at the provincial and federal levels) were widely supported for restoration projects involving designated properties; however, few specific tax proposals were offered.

iv) Greater Public Awareness

Public awareness was considered critical to enhancing support for, and participation in heritage conservation. One municipality spoke of the need to engage the efforts of all "players" in educating the public and promoting an understanding of "collective responsibility" for Ontario's heritage.

The province was called upon to play a greater leadership role in promoting heritage conservation by assisting such efforts as the publication of local histories, the provision of education programs on a formal and informal basis, and the celebration of heritage events on a local and province-wide basis.

v) Heritage Conservation and Tourism

Municipalities saw great potential in linking heritage and tourism, and called upon the province to coordinate intergovernmental efforts in the promotion and marketing of heritage events and sites throughout the province to tourists.

A number of concrete suggestions were put forward:

- There should be greater co-operation between both the Ministry of Culture and Communications and the Ministry of Tourism in tapping the tremendous tourism potential of the Province's heritage facilities.
- There should be increased promotion for heritage events (particularly Heritage Day).
- The Lottery Programme should fund joint-venture marketing projects undertaken by groups of cultural organizations with common objectives. These projects could be used to share markets and promote tourism.
- The Ministry should re-publish its Guide to Ontario Heritage Sites. This publication could be made available through bookstores and museum and art gallery gift-shops.

(Regional Municipality of Peel)

Further suggestions focused on the larger potential of area tourist development.

> Historical designation of specific locations within areas, perhaps using political riding constituencies as boundaries, should be considered. This type of designation could be tied into tourism promotion and therefore could be submitted for designation by regional tourist councils, in our case the James Bay Frontier.
>
> Some specific historical designation could be the Moosonee area to depict a combination of native and sub-Arctic history with detailed displays and an ongoing pageant in the Cochrane-Iroquois Falls area of the DeTroyes expedition. Similar type promotions tied into heritage and culture could be highlighted during the annual heritage weeks.
>
> The province should also consider setting up special funding to develop and evaluate the tourism potential of certain heritage preservation projects. Urban areas such as Niagara-on-the-Lake benefit substantially from the tourist attraction of a vital reuse of carefully preserved heritage buildings. This concept should be promoted and assisted by the province from the point of view of developing local economies, demonstrating reuse alternatives and encouraging preservation. This type of initiative reduces the need to rely on designation alone as the means for encouraging preservation activity.
>
> (Town of Kapuskasing)

3.1.2 PROVINCIAL ASSOCIATIONS

- **Association of Municipalities of Ontario (AMO)**

In its submission to the Heritage Policy Review, AMO reiterated the position taken in its 1981 Report on the Ontario Heritage Act, and emphasized three major premises:

- Comprehensive heritage preservation policies and programs are needed to protect and enhance Ontario's natural, cultural and built heritage. These must involve government and industry more actively;
- The municipal sector has a direct commitment to heritage conservation. This should be strengthened by developing planning and preservation policies to integrate heritage into the social and economic mainstream; and
- A provincial-municipal partnership should recognize collective responsibiltiy for heritage conservation while reaffirming the provincial commitment of leadership, financial and technical support.

AMO expressed support for the six guiding principles for heritage policy enunciated in the Discussion Paper, although not without some reservations. In particular, the Association felt that the principles should strongly express the province's obligation to protect heritage, and should clearly bind the Crown under the provisions of its own legislation, the Ontario Heritage Act.

> ...The province must accept ultimate responsibility for the preservation of the province's heritage and therefore be willing to intervene with on behalf of heritage sites with financial and legal authority where appropriate.
>
> ...The absence of provincial ability to designate heritage buildings, even in the absence of municipal willingness to do so, places most of the responsibility for heritage conservation with municipalities. The province must assume a greater stake in heritage conservation, including an active role in site identification and protection.

On the question of the municipal role in heritage conservation, AMO strongly affirmed the view that municipalities should maintain responsibility for identifying and designating heritage sites, and for facilitating private sector participation through the planning process. To this end, AMO called for

- greater municipal authority to protect heritage sites through such tools as permanent site protection powers, demolition fees, conditional demolition permits, and acquisition and expropriation powers;
- greater municipal flexibility with respect to the application of building codes, fire codes and official plans in the interests of building preservation;
- greater supporting resources, including an expanded advisory service from the Ministry;
- consideration of formal links between heritage conservation and the municipal planning process, such as a policy statement under the Planning Act; and
- provincial support for heritage planning in upper-tier municipalities.

The Association also pointed out that municipalities cannot be expected to play a central role in financing heritage preservation efforts.

> ...as cited in the first principle in the discussion paper, heritage is preserved as a common resource and therefore the province and the federal government have a primary financial responsibility, with municipalities facilitating the efforts through local plans and infrastructure.
>
> As for the economic spin offs related to the development of a heritage industry AMO points out that heritage resources are no more a direct municipal responsibility than natural resources. AMO believes the municipal responsibility is to provide sufficient infrastructure to support indigenous heritage sites and associated industries as is done for all other industries. It seems unreasonable that areas of provincial or national importance should require significant municipal financial participation.

To encourage cooperation between public and private sectors in the interests of heritage conservation, AMO proposed a multi-level "government-industry sensitive development strategy". This strategy would emphasize heritage planning in consultation with business development and other private sector interests, and would mobilize a range of incentives to encourage preservation and redevelopment of heritage structures, including:

- small scale joint ventures;
- support from the Small Business Development Corporation, with access to northern and eastern special tax provisions;
- reduction of economic incentives for building demolition, and;
- use of Ministry of Industry, Trade and Technology's data bank of entrepreneurs to introduce municipalities with heritage resources to private capital.

Finally, AMO reiterated the need for provincial funding and leadership in the formative stages of heritage resource identification and development, and called for a variety of measures to improve training, research and program funding including:

- provincial curriculum or sponsored courses for LACAC membership and municipal council orientation on the role of heritage conservation;
- development of a municipal heritage management certificate or heritage specialization in planning degrees to enable more municipalities to have "in house" heritage expertise;
- development of a comprehensive history of northern Ontario so heritage efforts can focus on what is clearly of historical value;
- funding for Heritage Art displays and operational support to municipal archives;
- provincial support for ecomuseums on par with other museums; and
- assistance to municipalities to develop an inventory of heritage resources.

3.2 LOCAL ARCHITECTURAL CONSERVATION ADVISORY COMMITTEES

Under the Ontario Heritage Act, municipalities may establish a local committee (known formally as the Local Architectural Conservation Advisory Committee or LACAC) to "advise and assist the council on all matters" relating to the designation of individual properties and heritage conservation districts.

Over thirty LACACs from across the province made submissions to the Heritage Policy Review. Comments centred largely on the roles of LACACs, their responsibilities, and the factors that influence their effectiveness. Of major concern were a number of perceived weaknesses in the Ontario Heritage Act relating primarily to the process of designation, and the implications of these for the ability of LACACs to carry out their responsibilities in a constructive and productive way.

3.2.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

Questions of definition and coverage, adequacy of legal protection, and effectiveness of delegated authority under the Ontario Heritage Act dominated the discussion regarding "gaps and inconsistencies." Of particular concern was the lack of provision in the Act for the designation and protection of buildings and sites in unorganized territories, and on Crown land.

Many LACACs suggested that municipalities should be given the power to designate both provincially and federally owned properties. Some felt, however, that the province should retain such a power, or should be able to substitute itself for a municipality in order to protect such properties if threatened. In either case, designation of provincial or federal sites should be undertaken only after consultation with the relevant municipality, and protection from demolition should be permanent.

As a means of identifying and protecting heritage properties, LACACs pointed out that the designation process is both cumbersome and lengthy. Many saw a pressing need for a provincial register of buildings and sites, classified by level of architectural or historical significance. A register, it was noted, could provide significant advantages over the current ad hoc approach to designation. First, it could form the basis for a two or three-tiered program of assistance, structured according to the level of historical or architectural significance of registered sites. Listing in the register would provide earlier opportunities for consultation between LACACs and property owners regarding proposed alterations, and would ensure (as a result of listing) that a photographic and documentary record was retained for future reference.

A number of suggestions were offered for streamlining, or otherwise improving the existing designation process. Many of these involved housekeeping amendments to the legislation, a synopsis of which is appended (see Appendix B). Key concerns and recommendations are discussed below.

Most LACACs felt that designation, in general, should provide much greater certainty in preventing demolition than is now the case. The delay of demolition must, at a minimum, be lengthened. Some suggested that developers should be required to submit heritage assessments (like environmental assessments) showing why a building or site should not be adapted or re-used before a demolition or building permit is issued. Permits should be refused where the evidence of architectural experts, historians, archaeologists or environmentalists has not been taken into account.

The majority argued for stronger legislation to permanently prevent demolition of designated properties. Demolition or vandalism of these sites should be punishable with strong measures (such as fines based on a percentage of the market value of the property). The Act, it was argued, should provide for the monitoring of designated sites by qualified inspection staff empowered to lay charges. In other words, violations of the Act should be enforced at the municipal level, rather than on recommendation of the Minister.

Expropriation, as a means of enforcing the Act, was also discussed. Some believed either municipalities or the province should be empowered to expropriate a threatened heritage structure at a fair price. One LACAC suggested that public funding should be made available to provide compensation, according to an appropriate provincial/municipal cost-sharing formula.

Of major concern was the need to clarify and simplify the process for designating heritage conservation districts, Specific suggestions included the following:

- Designated buildings should be permitted in heritage districts. Similarly, the exclusion of a building from designation under Part IV of the Ontario Heritage Act if it is already within a heritage conservation district would appear to serve no useful purpose. In fact, interior heritage features such as fireplaces, staircases, etc. may be lost because their architectural significance is not identified within the designation of a heritage conservation district;
- When a heritage area is designated as a heritage conservation district under Part V of the Ontario Heritage Act, and no objections to the subject designation are received by the municipality, there should be no requirement for an Ontario Municipal Board hearing prior to the final approval of the designating by-law. A heritage conservation district should be automatically deemed to be approved when no objections to the designation have been received within the specified time period;

- A control system similar to the Niagara Escarpment Act provisions (based on permits for all development including demolition) should be available under the Heritage Act so that planning control is comprehensive;
- Interim control for heritage districts should be permitted as soon as the "intent to designate" by-law is passed (similar to the procedure for individually designated buildings);
- There should be provisions to exempt certain alterations from the permit application process based on guidelines in the heritage conservation district plan. (A similar mechanism is provided for in-site plan control under the Planning Act.);
- Identifying signs and posters should be required and erected within designated heritage conservation districts to inform the public, potential property owners, real estate agents and other interested individuals of the historical significance of the designated heritage conservation district;
- Once an area is designated as a heritage conservation district, that designation should remain in place indefinitely based on the identified historic significance of the area. (One LACAC suggested, however, that there should be provisions for de-designating heritage districts where there are overriding reasons - e.g. fire destruction).

The need for an effective review and appeal process was a significant concern. While most felt that the appeal process from municipal decisions should be amended to allow those who favour designation to be heard, as well as those who oppose, LACACs did not necessarily agree on the appropriate appeal body. Some felt the Conservation Review Board should be the final arbiter both for designations of buildings and heritage conservation districts, and for alterations and demolition. Where an issue was deemed of provincial importance, the Minister of Culture and Communications would decide. The CRB, or a similar, reconstituted appeal board, should be widely representative of urban design professionals as well as business persons and interested citizens. Hearings should include deliberation on both the planning context and the architectural and historical merits of the case. And as an immediate housekeeping measure, LACACs noted, the Act should be amended to remove the need for hearings where objections have been withdrawn prior to the hearing date.

Some suggested that the Ontario Municipal Board (or a body more like the OMB than the CRB) should constitute the appeal board for the Ontario Heritage Act. One LACAC was of the view that a Provincial Ombudsman for heritage issues could be beneficial in reducing conflict by making the channels for conflict resolution clearer and less political. This would also ensure that smaller communities and organizations have a greater opportunity to represent their concerns.

Many LACACs saw the Heritage Policy Review as a timely opportunity both to broaden the boundaries of the current legislation and to harmonize the various provincial and federal statutes affecting heritage matters.

Some suggested that the provisions regarding "real property" in the current Act appear to place undue emphasis on buildings at the expense of landscape, both natural and man-made. As one LACAC pointed out, buildings cannot be divorced from their landscape; thus, the definition of heritage should clearly include the landscape associated with a building or site of architectural and/or historical merit.

The definition of "natural heritage" should be even broader, in the view of many LACACs. Although natural heritage may be protected as real property under Part IV of the Act, specific provision should be made in the legislation for the protection of open space, topographical features, and natural species.

Numerous provincial and federal statutes affect heritage conservation, including among others the Pits and Quarries Control Act, Education Act, Nursing Homes Act, Building Code, and Fire Code. LACACs felt it was particularly urgent to align various provisions in the Heritage Act, Planning Act and Assessment Act to support heritage principles. Specific recommendations included the following:

- Changes should be made to the Assessment Act to recognize the additional value placed on the property as a result of its heritage features (i.e. pine floors) which inflate the value of the property although such restoration is required for authenticity purposes. Perhaps a depreciation factor might be applied to structures of a given age;
- Large residential estate lot properties containing heritage structures should be considered as farm land for assessment purposes;
- Where alterations are a requirement under the Ontario Building Code (such as enclosure of stairwells and installation of metal doors and frames) and these seriously reduce the architectural and historic significance of the building and affect the reasons for designation there should be a specific procedure to obtain variances from the code under the Heritage Act. The municipal official responsible is otherwise legally bound to enforce the Building Code to the letter.
- The Ontario Planning Act should reference the fact that historic architectural features, the placement of buildings within heritage conservation districts, and actions necessary to properly restore heritage structures may not necessarily meet the zoning by-law requirements affected by current legislation. Relief to such requirements should be seriously considered when an identified heritage structure is required to obtain a variance from municipal by-laws for the purposes of authentic restoration or expansion.

ii) Current Division of Responsibilities

LACACs generally felt that the decentralization of responsibilities for heritage conservation to municipalities was both desirable and appropriate.

> Municipalities have a central role to play on heritage matters because of the diversity of historical backgrounds, periods of settlement and development, and availability of dedicated volunteers through local LACACs. In a province the size of Ontario with its regional differences, any centralization of heritage administration or management would not only be very costly but it would be a source of constant conflict of views and significance.
>
> (Woolwich Township LACAC)

Support was reiterated for the concept of a partnership between the province and the municipalities, with the province playing a "leading, unifying and standardizing role" in conserving natural and cultural heritage on behalf of all citizens. One LACAC suggested that any decentralization of authority "should not derogate from the primary responsibility of the province in providing leadership, support, education and funding".

It was often felt that the provincial role to encourage or require municipalities to take action in heritage matters must be strengthened. The Ministry of Culture and Communications was urged to develop policies for the protection of features of significant natural, architectural, historical and archaeological interest as defined in the Planning Act, and as authorized under Section 3 of that Act, for inclusion in the municipal planning process "....so that land-use policies explicitly address both new development and historic and environmental protection". As one LACAC pointed out:

> ... it is obvious that municipalities have a central role to play in heritage conservation, but it is extremely important that each municipality should have a LACAC and that local and regional official plans should support heritage conservation, both natural and man-made. Natural, heritage, and archaeological master plans with heritage policies would be ideal.
>
> (Caledon Heritage Committee)

At the same time, it was recognized that few trained persons, resources and mechanisms exist at the municipal level to support the processes of public policy development and implementation in heritage matters. Paradoxically, the official planning process often seems to "do more harm than good".

> It is used to legitimize heritage objectives; it then serves to bury them. While recognition is given to heritage in many official plans in the province, it is seldom internalized by councils, little understood, and usually ignored when push comes to shove. Planning has become so reactive and proceduralized, and dominated with approval processes, that the activity itself effectively militates against any form of proactive, creative thought and understanding of the essential nature of the community. Council and their professional planning staff are thus caught up in an endless cycle of "tail chasing". Planners wait for leadership from councillors, while councillors wait for a glimmer of guidance from planners in creative matters. What is of course required is council and staff working together, each contributing their own special insights and expertise. By this means a public agenda on key planning issues could be struck and images of the future of the community explored. In turn, these images could then become the focus for a truly creative collaborative planning process.
>
> (Aurora Heritage Committee)

Additional problems may arise in regional or county level planning and decision-making where the heritage policies or interests of area municipalities are not considered. One example was cited where a regional municipality approved a substantial and detrimental road-widening through a heritage conservation study district. It was suggested that it may be useful to appoint an agency such as a conservation authority to administer areas of shared heritage concern for a number of municipalities on a regional/county level.

Training and technical assistance for municipal councillors and planners, it was suggested, would assist municipalities in undertaking their heritage responsibilities more effectively. But equally important was the issue of funding. Small municipalities, in particular, lack the "resources and political clout to present alternatives to unsympathetic redevelopment or wholesale demolition". LACAC submissions stressed that adequate and ongoing funding programs must become a regular and certain feature of heritage conservation in Ontario. This includes a pressing need for:

- special emergency grants for heritage projects that are beyond the scope of a local funding base, and more flexible granting formulas based on such factors as the historical significance and overall condition of the property and the financial resources of the community or the property owner;
- more funding to the Ontario Heritage Foundaation for the purchase and maintenance of heritage properties;
- a long-term plan for the restoration, repair and maintenance of provincial government buildings and properties; and
- more capital, operating funding, and conservation resources for museums.

Flowing out of observations on the limitations of the current legislative provisions and procedures was a parallel concern over the future role of LACACs. Key issues included expanding the jurisdiction and legitimizing the authority of LACACs, improving technical resources, and rationalizing their organizational network on a province-wide basis.

Of great concern was the need to improve the ability of LACACs to provide effective, constructive advice. As volunteer committees, many felt handicapped by inadequate support and expertise, and called for better training for members. Some suggested the introduction of small annual operating grants, tied to municipal contributions. Others called variously for a staff support program, or for funding to engage coordinators, skilled advisors and interns. Information kits, or a revised and updated handbook explaining the designation process, would provide a useful way to reach more members of the community in a "pro-active" manner. As one submission pointed out:

> An appropriate role for a LACAC goes beyond merely creating an inventory or identifying for a community the extent of its heritage resources. It should do this, and do it as thoroughly as time and resources permit. Having done this it can then function as a watchdog, signaling to the community any misuse or threat to those resources. Beyond this, it should promote an awareness of the opportunities which the presence of such resources present from time to time. To do this successfully it must stimulate a partnership between public and private interests, bringing each of their own concerns and motivations together to find ways of capitalizing on the opportunities which individual situations present, be they threatening or otherwise.
>
> (Thunder Bay LACAC)

A more detailed elaboration of the roles and authority of LACACs, it was argued, should be included in the Ontario Heritage Act. Specifically:

- The wording of the Ontario Heritage Act (OHA) states that council "shall consult with" its LACAC in administering Parts IV and V of the legislation. The statute should now reflect the evolving role of LACACs to initiate as well as react to heritage matters;

- The duties of LACACs, not explained in the OHA but outlined in handbooks and guidelines from the Ministry, should be incorporated into the legislation to set a standard across Ontario. The title "LACAC" is now too limiting given the expanding role of LACAC interests since 1974. The word

> "Area" might replace "Architectural" to reflect the conservation of natural as well as built heritage areas;
>
> Given the complexity of heritage issues, LACACs require members with good intentions and knowledge of issues. While membership criteria is outlined in Ministry publications, a statement in the OHA would add credibility to the LACAC as an advisory body.
>
> (Aurora Heritage Committee)

Finally, LACACs called for an improved organizational network. Many simply need information about other LACACs through a newsletter (such as the insert published in Canadian Heritage), or through regular provincial and regional conferences. A federation or association of LACACs could also serve to improve communications and provide a network of support. One LACAC suggested that the role of the Ontario Heritage Foundation could be expanded to include such a function, with regional boards or branches providing regular communication to and from LACACs.

iii) Public Awareness

> The heritage movement in Ontario has an image problem. It is perceived to be concerned almost entirely with controls and restrictions. This image must be broken down and replaced with a new image which conveys the tremendously exciting potential which the preservation of our built environment presents. (A new) Heritage Policy should create opportunities and celebrate them.
>
> (Thunder Bay LACAC)

In the view of many LACACs, public awareness of the role and value of heritage conservation can be raised through promotion, public education and information, but most felt that a concerted commitment by the province will be necessary. To assist municipalities and LACACs at the community-level, a variety of measures were suggested:

- making Heritage Day a provincial holiday;

- holding conferences and workshops for LACAC members, heritage professionals, property owners, developers, architects, lawyers, and the general public;
- issuing research papers and technical bulletins similar to those provided under the Building Code;
- publishing brochures and producing television/radio programs on topics of universal interest, such as guidelines for cleaning buildings, preservation techniques, etc; and
- assisting municipalities and LACACs to promote the heritage value and attraction of their communities through public programs and activities, festivals and celebrations.

As well, it was the view of most LACACs that heritage and cultural theories and activities must be threaded through the curriculum at all levels of formal education.

> An early realization of the importance of our past gives us a cultural perspective.... The opportunities for students in a career related to heritage conservation must come from the government through support in courses, educational facilities, summer employment and the maintenance of a healthy heritage conservation attitude by the public in general.
>
> (Woolwich Township LACAC)

Many felt that heritage studies in elementary and secondary school must be given greater impetus. For example, school boards must be supported in curriculum development with technical assistance and teaching aids from the province. Community colleges should be encouraged to offer short courses in basic heritage conservation, management and administration. TV Ontario could be marshalled to provide similar courses leading to certification. And at all levels it was considered important to develop work experiences for students on a project or internship basis.

A variety of concerns were voiced with respect to entry and post-entry levels of professional training. A need for more "heritage expertise" was seen in all areas of restoration and preservation. Specific suggestions included:

- provincial or municipal certification for building trades involved in heritage building restoration;
- inclusion of these trades in the Journeyman Upgrading portion of the Ministry of Skills Development "Ontario Job Strategy";
- courses in conservation and restoration in schools of architecture;
- college and university courses in heritage resource management for municipalities;
- longer internships and job opportunities for trained interns; and
- professional development for planners, real estate developers, engineers and lawyers through formal courses in heritage conservation, addresses to annual association conferences, and articles in professional journals.

iv) Private Sector Resources and Efforts

Virtually all LACAC submissions called for some level of effort to "untax" heritage, and to provide positive inducements for private and corporate participation in heritage conservation.

> What we are observing .... is an increasing interest on the part of the private sector to take the challenge of heritage restoration and recycling of older buildings. Such initiatives should be encouraged and rewarded. The tangible benefits are not necessarily self-evident. There is still a strong perception that while the preservation of older buildings is admirable and reflects an appropriate and responsible attitude, the "value for dollar spent" can only best be achieved by new construction. Heritage Policy must provide a contervailing system to make the preservation of older buildings both admirable and rewarding for private developers. Much more agressive stimulation is required.
>
> (Thunder Bay LACAC)

Pointing to the U.S. Economic Recovery Tax Act (1981) as evidence of the benefits of tax incentives, LACACs made various suggestions for reform:

- income or corporate tax relief for heritage property restoration;
- exemption from provincial sales tax for work done to designated properties;
- municipal tax credits, deferrals or exemptions to offset increased property assessments arising from designation; or
- encouraging municipalities to lower the mill rate for designated properties; and
- some form of tax incentive for volunteer work.

At the same time, some LACACs argued that any tax reform must exclude the municipal tax system. Alternative or complementary inducements might include a program of low interest loans to enable large restoration projects that owners could not otherwise afford. Also popular was the idea of an awards system for recognition of good examples of conservation and preservation.

In summary, many felt that a more aggressive effort was needed to educate and promote the value of heritage conservation to developers and other private interests. The Ministry was urged to assume an advisory role in the provision of information to municipalities and developers on the economic development value of heritage conservation and adaptive re-use.

> The Ministry of Citizenship and Culture could assist in providing information such as current statistics, examples of feasible projects, professional expertise, and current literature. This information would be important in any promotion of heritage conservation to the municipal level; furthermore, with current literature and statistics from the Ministry, municipalities could disseminate this information as part of their business development programs.
>
> (Oakville LACAC)

v) Heritage Conservation and Tourism

A few LACACs offered comments on the tourism potential of Ontario's heritage. In particular, it was felt that the province has overlooked the attraction of small town architectural, cultural and historical heritage. Noting the problems that increased tourist traffic sometimes brings for small communities, it was suggested that the establishment of "Tourist Routes" might alleviate these, while bringing a measure of employment and prosperity to small villages and rural areas.

Another LACAC noted that the tourism potential of museums has also been under-utilized, and urged the Ministries of Tourism and Recreation, and Culture and Communications to coordinate their efforts to promote the tourist industry's use of museums. The tourism promotion of Ontario heritage, it was concluded, should be targetted both outside the province and to international audiences.

3.3 LOCAL HISTORICAL SOCIETIES

A small number of submissions were received from local historical societies across the province. While emphasizing the importance of understanding and celebrating Ontario's historical character and development, the briefs addressed the whole spectrum of policy issues raised by the Discussion Paper. Of particular concern was the need to resolve some important weaknesses in our approach to heritage conservation through a better division of responsibilities.

3.3.1 DISCUSSION PAPER ISSUES

1) Gaps and Inconsistencies in our Approach

The gaps and inconsistencies in our approach to heritage conservation were seen to stem directly from omissions in legislation, particularly in the area of heritage designation. The Ontario Heritage Act was considered vague in terms of defining and regulating the designation of heritage conservation districts, and in regard to the process of "de-designation". It was also felt that the Act does not go far enough in protecting designated sites from demolition, nor does it provide a meaningful recourse for appeal from municipal decisions.

> One solution is to grant a government body permanent demolition control. By this, we mean that a property, once designated, may never be demolished. This designation may be done by the municipal, regional or provincial government.
>
> There also could be some enabling legislation for private individuals and groups to request designation. At the present moment, only property owners themselves and the municipal councils may apply for designation. As councils are reluctant to designate private properties, this effectively means that only the property owner usually applies. If this owner is determined to demolish the building for his own private gain, there is nothing

> an outside body may do to prevent him. In cases where the building is of great historical significance, it is the community's loss. While private ownership should be respected, it should not be at the expense of our heritage.
>
> (Niagara Historical Society)

It was further recommended

> ...that an appeal process similar to the Ontario Municipal Board be established to rule on matters of designation and demolition, and that its decision be binding; and, that sites under such an appeal process be considered in relationship to their environmental significance as well as their individual historical and architectural significance.
>
> (North York Historical Society)

It was also pointed out that conflicts often cannot be resolved because the players have already developed positions before they come to the table. One solution would be adopt a more proactive approach to identifying and consulting on historically and architecturally significant properties -- in other words, a register of significant sites and structures:

> One method would be for local groups interested in historical preservation to list for designation significant properties, collections, geographical features, etc. in their area to create a provincial inventory. Owners would be notified that their property had been listed. While the properties may not be officially designated for historical conservation and qualify for the BRIC program, they, at least, would have been researched for future designation. Whenever one of these properties comes up for a building or demolition permit the municipality should have the power to stall the project until a suitable solution is worked out. If the building is of province wide importance, the province should have the right to step in and designate it.
>
> (Niagara Historical Society)

Finally , in the area of "gaps and inconsistencies" the question of funding programs for archives and museums was discussed. The Ministry, for example, was urged to acknowledge and support the development of local community archives as an aspect of heritage conservation that is receiving little consistent municipal support.

Inconsistencies in funding programs for "heritage" interests and "arts" interests were noted. Program funding and matching support for endowment donations are available to art galleries but not museums. One brief questioned whether museums should not also be encouraged to establish endowments with provincial support.

The adequacy of operating funding for community museums was also criticized. It was questioned, for example, whether the province should not help to provide a balance in areas where municipal funding is low. Noting also that museum operating grants have not kept pace with inflation or escalating operating costs, one brief urged that conservation of heritage resources by museums, libraries and archives be given a higher priority at all levels of government.

> It seems essential that museum growth and expansion should be accommodated in the long range planning at the municipal, provincial and federal levels to ensure the availability of resources. This growth and expansion cannot be limited to new endeavours but must offer more support to existing sites if those sites are to properly fulfill their functions. Appropriate housing and climate controlled conditions should be more easily obtained. The volunteer boards of historical societies operating museums on "shoe string" budgets are severely limited in what they can accomplish.
>
> (Brant Historical Society)

ii) Current Division of Responsibilities

While most agreed that the recognition and identification of heritage resources must take place at the community level, many argued that municipal governments are not always the most appropriate body to determine the value of heritage conservation. In some cities, an adversarial situation has developed between councils unsympathetic to heritage conservation and historical societies and other citizen groups. LACACs are caught in the middle, as they "owe their very existence to Council's pleasure and in any case, can only recommend action to Council".

Others noted that the municipal governments are often pressured by developers, who bring with their projects the promise of higher assessment rates and more tax dollars. As one brief pointed out, most small towns which are "desperate for new development, do not have the resources, the will, nor the expertise to negotiate a site plan agreement favourable to heritage preservation"; but even in larger cities, the situation can be the same. In one large municipality, it was reported that:

> Every case of demolition, relocation and threatened demolition has been to provide for high-density development. Heritage easements have never been employed. Powerful developers and the prospect of increased tax revenue win out over abstracts every time. The only weapons we have are public outcry and provincial legislation in such forms as the Ontario Municipal Board and the Environmental Protection Act.
>
> (North York Historical Society)

One proposed solution was to strengthen the consultative process by entrenching heritage considerations in the planning process. It was recommended

> ...that measures be introduced into the planning process to ensure that when heritage sites are under consideration for re-development, a study procedure take place to investigate all possible avenues of incorporating the site within the re-development; and that measures be introduced to prevent the issuing of demolition permits without such a consultative process having taken place.
> (North York Historical Society)

Alternatively, or in addition, it was felt that the province should have the authority to designate certain heritage districts or towns having province-wide significance, and to afford special assistance and protection to such districts in light of their status.

Many submissions pointed to the need to expand the advisory services of the Ministry itself. While praising the quality of advice and support from the Heritage Branch, it was commented that the Branch was understaffed relative to the level of need and demand throughout the province.

> Staff of the Ministry continue to occupy a unique role within both the professional and volunteer spheres of the heritage community. As a resource team they are invaluable. They are readily available to advise and assist on any aspect of heritage preservation and management. Most staff have considerable experience in the field and their input is vital... (it was therefore recommended that) the role of Ministry staff in heritage preservation be recognized as vital to the process, and that an adequate staff complement be established.
> (North York Historical Society)

It was also suggested that the Heritage Branch establish regional operations by placing advisors authorized to make decisions in Ministry Regional Offices, and further by providing the services of field officers, resident in communities not adequately served by Regional staff. Initially, it was proposed, the "field officer" concept could be tried on a pilot basis in three or four regions.

> The services of a field officer operating (and resident) in a given territory could do a great deal to promote and facilitate heritage projects and programmes. This is not intended to degrade the value of Regional Offices, whose staff have been most helpful in the past. It merely suggests that an officer who is recognized as a 'local' could gain and retain the confidence of heritage groups, and thereby promote and encourage local initiative. One particular area where the expertise of a field officer would be most appreciated is the application for grants to fund specific projects. The meeting at Renfrew, in June, brought out, very clearly, the reluctance of some organized groups to apply for funds. Such groups are clearly overwhelmed by the paperwork involved. It is true that the formalities are often less formidable than they appear, but volunteers who may be unaccustomed to government procedures are often discouraged. The direct assistance of a field officer in completing forms, explaining the 'vocabulary' of heritage programmes, and giving advice and encouragement to local groups, could do wonders towards promoting local initiatives.
>
> (North Lanark Historical Society)

Finally, it was recommended that the position of the Ontario Heritage Foundation within the heritage community should be clarified, and the role, scope and programs of the OHF clearly defined and communicated. It was also suggested that OHF programs should include loans in the form of mortgages, to provide for the acquisition of locally significant properties in special circumstances when there appears to be no other means of protecting such sites.

iii) Resources and Efforts of the Private Sector

Submissions acknowledged the need to engage the efforts of developers and property owners in support of heritage conservation. Meaningful federal and provincial tax incentives for conservation and preservation of historic sites were urged, and property tax reforms were proposed:

> ...the private sector is often penalized for owning a historical property. There should be more cooperation between the tax department and heritage programs. Often, designated properties have large grounds, which the property assessor regards as potential building lots, and assesses accordingly. However, the property, as it has been designated, may not be broken up into building lots. The tax department should include designation in its formula for assessment.
>
> (Niagara Historical Society)

Often, it was a question of publicizing available assistance programs more effectively, and encouraging various private organizations and individuals to recognize the collective value of heritage resources. For example, one brief suggested most firms and organizations are not aware of the archival value of their old documents, drawings and other records, and discard them. Perhaps tax receipts could be issued for donation of archival material to libraries and museums. Similarly, changes to the Ontario Heritage Act to extend protection (and provide funding) to other types of resources, such as collections of artifacts or documents, might provide an incentive to individuals and private organizations to preserve and retain valuable historical items in communities.

iv) Increase Communications and Cooperation

Measures to increase cooperation among the various agencies and organizations active in heritage conservation focused on the need to create regional centres and regional organizational structures or networks. A submission from northern Ontario called for a regional heritage resource centre, accessible to teachers and others interested in heritage conservation. Another focused on the particular problem of storage and restoration of artifacts, and suggested that the Ministry offer more regional workshops to assist local groups in conservation practices.

Other submissions were concerned with finding ways to ensure that efforts were not being duplicated, or that whole areas in our portrayal of our past were not being ignored through lack of communication or coordination among heritage organizations and institutions. One brief suggested a new regional organizational structure for local historical and heritage organizations in order to improve the development of strategies for program and service delivery across the province, avoid competition for limited public funds, and raise the profile of heritage conservation activities among municipal governments and the public.

On a local level, one historical society noted the potential for bringing together experts in all fields of concern to heritage conservation -- environment and nature, language and culture, as well as tourism -- to act as a formal advisory committee to the local council in addition to (or as an expanded version of) the LACAC.

Finally, it was felt there should be more cooperation among provincial government ministries having interests in heritage conservation. It was suggested that it might prove useful to hold an interministerial conference to promote cultural and natural heritage conservation, and, on a more formal level, to require every government department to establish guidelines for heritage protection in its field of jurisdiction.

v) Greater Public Awareness

It was widely felt that heritage conservation efforts could benefit from greater public awareness.

> The Discussion Paper suggests that "Ontario's natural and cultural heritage is an invaluable and irreplaceable resource to which all citizens of the province and their elected representatives have an important and ongoing commitment."

> The question that arises from this assumption is whether or not Ontario's citizens have made that commitment, or whether they accept that commitment as necessary. There is a great deal that can be done at all levels to heighten public awareness of the need for a commitment to the preservation of our heritage.
>
> On the local level, historical societies, museums, and LACACs work to raise public awareness in their communities. Could more be done at the provincial and federal levels to promote heritage in general and to educate the public on how they can be involved? Organizations like the Ontario Historical Society work at the provincial level toward that end, but are limited by funds and staff size. Just as the Ministry of Tourism's "Ontario: It's Incredible" campaign has made people more aware of their province as a tourist attraction, so a promotion campaign could serve to heighten awareness of heritage and its importance.
>
> (Brant Historical Society)

Heritage programs at all levels of the school system were encouraged, as well as summer programs at historic sites to teach "old time skills" to younger children, and to provide hands-on experience for older students in such activities as archaeological projects.

> The heritage resources of this province, museums, historical sites, heritage buildings and districts, to name a few, are invaluable educational tools. Museums in every community are working to attain that recognition and to cooperate with school boards and teachers in the realm of education. This task could be facilitated by a closer liaison at the provincial level between the Ministry of Citizenship and Culture and the Ministry of Education. The educators could thereby gain a greater understanding which could be passed on to the regional and local levels through teaching aids, policy papers, and documents ... By the same token, the Ministry of Citizenship and Culture would gain greater insight into what the school system needs from the heritage community and how best to meet those needs.
>
> (Brant Historical Society)

A great deal of support was expressed for more assistance in the form of loans or grants for the publication of local histories, as a creative way both to involve members of a community in the activity of research and compilation, and to provide a tool for increasing awareness and contributing to the documentation and preservation of the Ontario's historical past.

Public awareness could also be raised by a variety of other means -- from monuments to local heroes, plaques and street names to commemorate important events and historical figures, through to newspaper articles and speakers on topics of interest in communities.

vi) Heritage Conservation and Tourism

Submissions pointed out that the tourism potential of communities could be enhanced by cooperative efforts among local museums, historical sites, galleries, theatres, restaurants and shops. Specific suggestions included the following:

- Museums and heritage sites could be assisted by the Ministry of Tourism and Recreation to produce pamphlets, maps and brochures for widespread distribution. Advertising costs are prohibitive for small museums.
- Tourist museum passports allowing entry to a specified number of sites could be sold through tourist centres, ticket outlets and the like, such as the National Trust does in England.
- Museums must be encouraged (forced, if necessary) to be open some evenings, especially during spring, summer and fall. If museums exist for the public good, they should be accessible to that public.
- The "tourist season" might be extended beyond the confines of Victoria Day and Thanksgiving. What effect would there be on tourism if the school year no longer dictated three holiday seasons in Ontario? The British school year spreads out the holidays over the year. Is it really necessary any

> longer to close schools over a two month period to free the children to help bring in the crops? Is it even educationally sound? Would the transfer of a week to the spring and fall encourage Ontarians to travel within our own province?
> (North York Historical Society)

Finally, more facilities and attractions for tourists and visitors were proposed, including interpretive centres in provincial parks, and heritage villages and sites in northern Ontario based on themes of early French settlement and fur trading routes.

Heritage conservation, it was agreed, can clearly serve as a stimulant to tourism; however, tourism can become the source of community conflict.

> ...tourists interested in heritage conservation bring with them needs that often conflict with the very heritage they come to see. Traffic can destroy the historic atmosphere of a small town. Fast food outlets and motel units that serve the tourist market are also unsympathetic. Large hotel developments in the core often replace historic buildings. All too often the profit from tourism goes to the private owner, and the benefit of tourism is shown only in personal income taxes. The town, however, can only raise money through property taxes and often cannot afford the facilities that tourists require, such as visitor centres, public washrooms, bus parking, etc. The resident resents not only the increase pedestrian and vehicular traffic, but, as well, the additional financial burden that tourism places on him.
> (Niagara Historical Society)

One proposed solution involved province-wide planning, whereby certain areas or communities designated as "tourist routes" could qualify for special grants to solve traffic problems, improve streetscapes, and provide parking facilities, washrooms and visitor centres.

vii) Strengthen Professional Training

A very real need for professional training and educational opportunities was noted for museum personnel, including volunteers, in all aspects of conservation, exhibit design, and interpretation. It was also pointed out that many courses given by the Ontario Historical Society are popular and frequently oversubscribed. The Ontario Museum Association certificate courses have the same appeal and problem. These courses could be offered more often.

A related issue with respect to professional development was the question of staffing and salaries.

> Most of the museums and historic sites in this province are inadequately staffed. This problem has many facets. Such sites are limited in the services they can provide their communities. A vicious circle evolves: without sufficient staff one cannot raise sufficient funds to hire more staff. One solution has been the use of short-term contract staff on a variety of programs but this is only a "band-aid" solution which temporarily raises expectations and creates work in the provision of training, supervision and bookkeeping.
>
> One of the other problems that arises in relation to adequately trained staff in adequate numbers is that in order to attract qualified people, the staff must be paid at parity with other similar professions. This is generally not the case and there are no salary guidelines to assist historical societies/museums in determining appropriate salary levels.
>
> (Brant Historical Society)

viii) New Information Technologies

A proposal was made for the examination, design and development of suitable automated information systems to support heritage conservation. A useful "heritage database" could involve, among other things, the following:

> a record of artifacts in the possession of each regional museum or heritage group (using inventory software);

- a listing of all identified heritage buildings, sites, natural locations;
- an index system, with appropriate cross references, to facilitate search of the data base;
- a network facility for communication between heritage organizations; and
- a central control facility, at the provincial level, with power and facilities to ensure compatability in both hardware and software among heritage organizations.

It was acknowledged that initial financial costs for the development of such a system would have to be borne by the province; however, some sort of subscriber or user charge could be considered to recover ongoing operating costs. The heritage database, it was further suggested, could be carried on existing provincial computer facilities, and the same rules as practised by the Ontario Historical Society regarding confidentiality and access to information could be applied.

3.3.2 PROVINCIAL ASSOCIATIONS

Ontario Historical Society (OHS)

Since its founding in 1888, the Ontario Historical Society has taken an active interest in fostering heritage conservation by lobbying for, encouraging and supporting a variety of conservation projects and programs.

In its submission to the Heritage Policy Review, the OHS focussed primarily on its disappointment and dissatisfaction with the conduct of the Review, and the communication of the goals and objectives of the policy exercise to the public.

Noting that "heritage touches and effects every aspect of everyday life", the OHS called for a new Heritage Act that "reflects the policies and programmes that recognize our unique history, heritage and future."

> ...In addition it must seriously address the involvement and support of all provincial ministries, partnerships involving the province, municipal governments and local resources, and the benefits and obligations of the heritage tourism strategies.

A commitment of extensive financial and human resources by the province and a comprehensive educational program were also considered to be "essential components" of a new heritage policy.

3.4 LOCAL HERITAGE ORGANIZATIONS

Local heritage organizations responding to the Heritage Policy Review ranged from community-based heritage foundations such as Heritage Ottawa and the Waterloo Regional Heritage Foundation, whose mandates embraced a spectrum of interests, through specialized associations such as the Harrow Early Immigrant Research Society and the United Empire Loyalists Association, to organizations devoted to a specific endeavour, such as the Prescott Main Street Canada Office.

Not surprisingly, the types of concerns and recommendations varied greatly, and touched on broad issues of policy and legislative change, as well as specific problems facing small communities and organizations. These are summarized around the relevant Discussion Paper issues in the sections that follow.

3.4.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

Major gaps and inconsistencies in our approach to heritage conservation were highlighted in one submission which contrasted Ontario's situation with that in other provinces and other western nations.

> One can begin with the subject matter. The Act could not address all areas of heritage concern: for example, intangible heritage was not discussed (and would be extremely difficult to address in such a statute anyway). However, even in the area of tangible heritage, there were entire areas which appeared to be forgotten. For example, palaeontology was entirely overlooked by the legislation. The status of natural landscape is unclear. Ontario has the only provincial government in Canada which has no provincial

> mechanism for the protection of heritage buildings and districts. Furthermore, Ontario is the only province which has no mechanism for the permanent protection of heritage buildings and districts. As one can infer, almost every province allows both the provincial authorities and the municipal authorities to confer permanent protection on a site; Ontario empowers neither. Unlike other jurisdictions, Ontario does not allow non-governmental institutions to enter into permanent contracts for the protection of sites. In most of North America, the citizenry has a vested right to block projects which illegally tamper with heritage resources; the Ontario Act (and related legislation) articulate no such right.
> (Heritage Ottawa)

On the "inducement" side of heritage conservation policies and practices, serious discrepancies were also noted.

> The above discrepancies address the "regulatory" side of legislation. However, the "inducement" side of legislation displays at least as many discrepancies. In some parts of Canada, provincial sales taxes are waived on projects which rehab heritage sites; in Ontario, there is no such waiver. Through much of North America, rehab investors are not faced with massive municipal tax increases whenever they improve a heritage building; Ontario has said nothing on the subject. Through most of North America, there are income tax measures which not only counterbalance the current disincentives against heritage, but which provide actual inducements; such measures are under provincial study elsewhere in Canada, but no such mention of this is found in Ontario's current legislation.
>
> In terms of outright economic inducements, the track record in other jurisdictions has pointed to a wide variety of conceivable formats. Shouldn't Ontario explore unilateral income tax action (as Alberta is doing) to induce heritage investment? Shouldn't there be a waiver, as in Nova Scotia, on sales taxes pertaining to heritage projects. Shouldn't municipalities be encouraged to introduce property tax measures, as currently exists throughout most of North America? Is it not counterproductive for owners who improve heritage

> sites to face sizeable municipal tax increases, or shouldn't those increases be deferred? Shouldn't heritage investments be eligible for Ontario's venture capital programs, which are now focused only on manufacturing, publishing and tourism?
>
> (Heritage Ottawa)

Concern was expressed about the inadequacy of information on the province's two thousand designated heritage sites. A central registry modelled on the U.S. National Register was suggested as a means of formally documenting heritage resources. Listing on the Register, it was noted, has become a "thing of value" in the United States. Listed buildings are sold at a premium because of their status, as well as the tax benefits available upon restoration.

It was acknowledged that while other jurisdictions have devised alternative approaches to some of the key problems in heritage conservation, these may not always be appropriate to the Ontario situation.

> It is not a foregone conclusion that Ontario should necessarily mimic what is done in other provinces, let alone what is done in the U.S., Australia, the U.K. or elsewhere. However, the track record of other jurisdictions provide Ontarians with a point of departure in our discussion of future heritage policy. It gives us an idea of what has been feasible elsewhere, and a profile of various options which we can adopt, reject or modify to suit Ontario's own needs.
>
> (Heritage Ottawa)

ii) Current Division of Responsibilities

Remarks regarding the effectiveness of the current division of responsibilities tended to emphasize the conflicting motives and pressures that militate against heritage conservation. It was often noted that municipal councils and planning departments may or may not, be sympathetic to or interested in heritage conservation, yet councils hold final authority over the designation process. It was argued that:

> The Ontario Heritage Act should define provincial rights for designation. Local groups should be able to appeal to the Province for designation of heritage structures and environments. This appeal would overrule the Municipal Council's decision. The Act should stipulate that inventories of all heritage resources be made and kept on file with municipal departments such as Planning and Development, Engineering and City Clerk. The inventory must be consulted as part of every development proposal or building permit issuance. These proposals will be checked by legal means before the project is given approval. If demolition occurs and a heritage resource is discovered, the developer would be subject to a fine. The fine would be based on a percentage of the project's value.
>
> (Waterloo Regional Heritage Foundation)

The province was urged to take a strong leadership role in encouraging local governing bodies to give heritage concerns a higher priority.

> We feel that we are providing a service to the residents of both town and township, and that our work could be considered a tourist attraction. A public policy of boosting heritage preservation on the part of the local governing bodies, of reaching out to heritage organizations with a local budget, an attitude that is as much their duty as the maintenance of ditches and sewers and water supply, would be most helpful to historical societies.
>
> In our experience, it would be unproductive to place too much responsibility for heritage concerns at the local municipal level. The size of the councils is too small; there are too many urgent and practical matters which demand their attention. The best that we could hope for would be a positive attitude to heritage concerns, which would support and assist well managed heritage organizations to complete their plans within the municipality. The province could offer some incentives to the councils to assure their support of cultural endeavours.
>
> (Harrow Early Immigrant Research Society)

One way to formalize local heritage conservation efforts would involve the development of heritage policies at the municipal and regional levels and the public communication of such policies.

> In formulating policy, these councils would find it useful to bring heritage organizations together to review their needs and goals. Provincial ministry personnel might assist in the local application of provincial guidelines. Area and regional forms of government would be encouraged to have broader policies co-ordinating the many heritage related enterprises of the region.
>
> (Harrow Early Immigrant Research Society)

It was felt that the planning process could also be used more effectively to address heritage conservation issues. In some jurisdictions, it was noted, heritage is an obligatory component of official plans. Indeed, under the World Heritage Convention, there is a treaty obligation to integrate heritage into comprehensive planning programs.

> The government of Ontario can also exercise leadership in the issue of guidelines for municipal planning; that power is articulated at ss. 3(1) and 22(5) of the Planning Act. Is it not time for Ontario to articulate an unequivocal message on the importance of heritage and rehab for the future of Ontario's cities and planning process? Is it not time for most, if not all of the above concerns, which have been reflected in the discussion paper and in this brief, to be reflected in those guidelines?
>
> (Heritage Ottawa)

Finally, it was suggested by one writer that a "Provincial Heritage Trust" or some form of central umbrella organization was needed to provide such services as:

> . a "HIT" (Heritage in Trouble) line that volunteers could dial to obtain first-hand advice on matters of demolition control, restoration, funding, environmental preservation, etc.;
>
> . a databank or directory of services offered by local artisans, restoration architects, suppliers of building materials, researchers, "how-to" publications, etc.; and
>
> . a "prospectus" outlining investment opportunities and benefits of heritage property development, targetted to the business community and available for use by LACACs and local heritage groups.
>
> (Waterloo Regional Heritage Foundation)

On the theme of assisting local advisory committees and councils in addressing heritage concerns more effectively, another writer spoke of the particular problems of small communities.

> In the case of small towns where history and heritage is not viewed an asset to economic improvement, I feel that it is prudent for a higher level of government to provide extra assistance to LACAC Committees. The assistance should be in the form of guidance to the Council and the Committee in the legislative aspects of what can and can not be done with respect to heritage, the economic advantages to building owners of designation, and lack of real threat to owners' right of use of their property. Unless this is done by a senior level of government, I believe that many of our heritage resources will continue to be lost when they need not be, strictly through a lack of community education which does not readily come forth from interests of the community itself.
>
> So the suggestion that more training and compulsory training will be provided for LACACs under the recently announced Preserving Ontario's Architecture program is welcome news.
> (Prescott Main Street Canada Office)

iii) Resources and Efforts of the Private Sector

It was widely felt that the resources and efforts of the private sector could be secured most effectively if more emphasis were placed on the economic development value of heritage conservation. This effort should be backed up by changes to the Planning and Assessment Acts, and by incentives for property restoration and recycling.

> What is needed is the ability to provide transfer of development rights, tax credits for heritage building rehabilitation, temporary assessment freezes after improvement of property, and several other things. These incentives would encourage building owners to have properties designated, spend money to upgrade them and work with them, rather than to allow them to deteriorate and eventually demolish them for any expansion or new development.

> The Planning Act does little to encourage the conservation of heritage buildings. One thing that is used in other provinces and is permitted in the United States and many other countries is design guidelines that are enforcible because they are by-laws. In smaller communities, among the "go-getters" there just isn't an appreciation for heritage buildings or the heritage of the area. These buildings are seen as reminders of perhaps a glorious past that has not endured or a reflection of a non-modern community.
>
> Government could also provide incentives through the Assessment Act whereby improvements to recognized heritage buildings would not be treated with a full increase in property assessment say for a period of five years.
>
> (Prescott Main Street Canada Office)

A variety of related initiatives and incentives were proposed:

> A related inducement for heritage buildings, has been provided throughout much of North America ...where governments have given heritage buildings a right of first refusal on governmental office space. Shouldn't the province and municipalities be obliged to locate their offices in heritage buildings, before they can look to other construction?
>
> The availability of technical expertise...can have a further and very beneficial impact on property. For example, some jurisdictions provide free expertise to the owners of heritage property, and that is an indisputable benefit for such owners. Shouldn't Ontario do likewise?
>
> (Heritage Ottawa)

Another writer focused on the potential benefits of tax incentives.

> Support recycling buildings with tax incentives. On commercial ventures, for every $3 invested, $1 should have been tax free. Similar U.S. programmes have been highly successful. Present this information and negotiate it with the Minister of Revenue. Sales tax on building supplies for recycling structures should be reduced or eliminated.

> Create tax incentives and grant programmes for pre-1941 structures. Part XI of the Building Code is quoted as a means of working around regulation to easily recycle pre-1941 buildings. The Ministry must promote and clarify Part XI to developers and those in the construction industry.
> (Waterloo Regional Heritage Foundation)

iv) Increase Communications and Cooperation

Many small, volunteer-based organizations face ongoing problems of maintaining viable operations and attracting capable leaders. Liaison and advice from the Ministry on such matters was called for.

On a broader scale, the province was urged to recognize and support opportunities for county or regional networks of cultural organizations and facilities. These could include museums, libraries and archives, as well as the variety of heritage and historical societies in a given regions. As one submission pointed out:

> Too many small, unviable enterprises are not producing the maximum quality which should be our goal. There is not enough correlation of heritage information gathered in small pockets of activity. To receive funding, these organizations should be required to share information with other heritage groups of the area, and to achieve regional collections of material.
>
> A networking structure should be encouraged, not to multiply meetings, but to keep information flowing between groups. Essex County is now moving slowly in that direction, and we endorse this enterprise.
> (Harrow Early Immigrant Research Society)

v) Greater Public Awareness

It was widely felt that greater efforts are needed to incorporate heritage conservation as part of the formal education system at all levels, but particularly among the young. More emphasis could be placed in promoting Ontario's historical roots, and the achievements of early settlers through the publication of textbooks designed for elementary and high school students, and through other means such as dramatic presentations, interactive exhibits in parks and museums, and permanent displays.

More assistance is needed for the promotion of historical areas through brochures, maps, booklets and plaques. One writer urged the Ministries of Culture and Communications, Transportation, and Tourism and Recreation to collaborate in allocating more road and highway signs for designated districts and sites. Highway signs generate visibility and contribute to tourism, and as such could also provide greater incentives for involvement by communities in heritage conservation activities.

vi) Heritage Conservation and Tourism

Some suggestions were received for promoting tourism by building on the successes of theme events such as the 1984 Provincial Bicentennial. The economic benefits that tourism can bring, particularly to small communities, were emphasized.

> As the studies in the tourist industry have shown, travellers often seek a local heritage experience. Smaller communities have very stiff competition for industrial development. The tourism industry is one of their best bets for improving the economic climate. So they need extra help and guidance in recognizing the value of their heritage resources and in developing them even though the local public's short-term interest may not appreciate the value of such development.
>
> Some may see these comments as being somewhat upper handed and suggesting that higher levels of government dictate to municipalities. I do not feel that is the case. The residents of the entire province have an interest in heritage resources of the entire Province. It should not only be up to a

local municipality whether they choose to preserve and build upon heritage resources located within their boundaries. Others in the Province have rights to them, and a stake in the property and the enjoyment of these communities.

(Prescott Main Street Canada Office)

3.5 ARCHIVES

The submissions received from the archives community contained a range of opinion from such diverse organizations as community-based public archives, religious, educational and other private or non-profit organizational archives, as well as archivists' associations and individual supporters and users.

Submissions came from across the province, but were concentrated in the central and eastern regions. Regardless of origin, there was considerable unanimity in the observations and recommendations around the following needs:

- recognition of the vital role which archives have to play in heritage activities in any future heritage policy for Ontario;
- development of institutional standards for archives through the Ontario Council of Archives;
- establishment of local and regional archival facilities to allow for the maintenance of archival materials within their geographic context;
- provision of regional services, such as conservation facilities, to serve a variety of Ministry clients including archives, museums, libraries, and galleries; and
- increased attention to machine-readable records for the purpose of upgrading Ontario's ability to document the 20th century

3.5.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

Two major concerns regarding archives were raised in the context of the discussion of "gaps and inconsistencies"; first, the lack of recognition and funding for archives; and second, inappropriate archival legislation.

Many briefs pointed to the fact that archives have long been "the orphan child" of heritage policy and program development. They have not been part of the popular conception of heritage, nor have they benefited from provincial or capital improvement or labour support programs, or from the kind of ongoing operating support available to community museums. This has had a further negative impact, in that much historically important material is being lost daily in the province, through ignorance, and through the inability of archives to reach out in a "pro-active" sense.

A measure of the low profile of archives, it was argued, is the inadequacy of governing legislation. As one brief stated, "It is our belief that archives and the archival heritage need greater attention in Ontario than they presently receive and the best way to extend the support needed is either through a revised Ontario Heritage Act or through a new Archives of Ontario Act." Another pointed out:

> Where the federal Archives of Canada Act (1987), and the recent Act for the Archives Nationales du Quebec allow for wide-ranging powers in support of acquisition, conservation, access and support to the general archival community, the present Archives of Ontario Act does not even adequately define the collecting policy, let alone look at the larger, leadership role required now of the Archives of Ontario if the archival sector as a whole is to move forward in a constructive way.
> (Queen's University Archives)

ii) Current Division of Responsibilities

While archives were supportive of the notion of decentralization of heritage responsibilities, there was a strong message that this should not detract from the essential provincial role of "support, leadership and facilitation," and the channelling of appropriate funding.

As one brief pointed out, "The division of responsibilities is important, but one of the central issues from a local point of view in the review process is what programs will be initiated, continued or terminated in terms of financial support from the province."

Archives called for provincial leadership in establishing initiatives and developing a uniform policy across the province. Legislative and funding changes, it was agreed, should follow some clear objectives in the archival field. Among the most pressing needs were:

- strategies at the provincial level to assist local and regional archival development and to define responsibilities for collection, retention and preservation of archival resources;
- regional conservation facilities serving local archives, museums, libraries and galleries;
- proper storage facilities;
- provincial support for both the archival professional association (Ontario Association of Archivists) and the archival institutional association (Ontario Council of Archives) to address particular needs in professional training and education. It was also suggested that OCA could serve as the appropriate body for the development of institutional standards for archives; and
- provincial matching grants to enhance Canadian Council of Archives funding programs for archival research.

It was argued that better approaches were needed for the preservation of governmental records at both the provincial and municipal levels.

> Every municipality in this province, whether rural or urban, creates documentation which is worthy of permanent preservation. Yet there are not more than a dozen archives across the province with the mandate to deal with the records of individual counties, regional governments, cities, and towns.

> More must be done to develop at the very least regional if not local archival repositories. Local government cannot be left with records-related obligations under the Ontario Municipal Act and no means of discharging them.
> (Southwestern Ontario Architects Association)

On the same issue, one brief noted that the lack of readily available, properly arranged local archival materials has a direct and detrimental effect on the quality of municipal decision-making. The potential for archival support in urban planning has been overlooked.

> This is the immensely practical side of local archives. Able as all archives are to provide documentation for retropective analysis... municipal archives have the added dimension of being able to provide information on that most important local resource -- land -- and with land, property. Taxation, assessment, local improvements, and so on are all reflected in municipal records. Local archives, when developed with a comprehensive approach to documentation, including private sector records, provide a strong base of support for related heritage activities including architectural conservation, archaeology, genealogy, and the writing and study of local history. We believe that no provincial heritage policy will succeed at the local level until such time as local archives are made an integral part, and indeed supporting service, of the policy.
> (Southwestern Ontario Archivists Association)

A consultative and advisory role in this area for the Archives of Ontario was suggested.

> Clearly the decisions as to what should best be conserved of municipal (local, regional) archival resources -- whether architectural drawings, family papers, records of firms, or deliberations of local governments, could best be made at the municipal level, if there is sufficient awareness of the unique nature of and future uses for these materials. Consultation and cooperation by local archives with the Ontario Provincial Archives is one key to success in this area. The decision to

> conserve archival resources carries with it a whole allied range of responsibilities, some of which at least, might extend beyond those of the creating body to a role for the province itself, in ensuring that appropriate funds are channelled into this particular avenue of the heritage movement.
> (Queen's University Archives)

The proper role for both the Public Archives of Canada and the Archives of Ontario vis-a-vis a larger network of regional and local archives was an issue of considerable prominence.

> The Public Archives of Canada undoubtedly has more documentation on Ontario than it has on any other province or territory. Given that the PAC is based in Ontario, given past competition between archival institutions, and the lack of adequate archival development across the province, Canada's largest archives has had a great impact on Ontario's documentary heritage. The fact, for example, that the Public Archives of Canada has taken a leading role in the preservation of labour records has meant that the historic records of the Ontario Federation of Labour are housed not in Toronto but in Ottawa. It is not only time to put adequate resources into the Archives of Ontario, which we consider to be the sine qua non of archival development in this province, but also to put adequate resources into regional and local archival endeavours so that Ontario's recorded history may be preserved and made accessible within the appropriate geographical context.
> (Southwestern Ontario Archivists Association)

At the same time, archives called for a revision of the practice of removing archival materials from areas already served by a local archives or museum repository.

> Banish these search-and-remove missions and the resulting paranoia. Let the Archives of Ontario support the archival field and serve the public as it is once again trying to do. Enable it to hire the staff that has so desperately been lacking. Give it the equipment which will allow its collection to be of widespread use. For example, a 105mm. diazo microfiche copier allowing the huge map collection to be quickly and effectively reproduced in efficient single sheets. Rework its federal tax grant status so it will aid local archives in gaining historical material rather than always competing and winning.
> (Nipissing Archives)

It was concluded that "the more firmly established, cooperative links can be made between archival repositories, the more effective any programs of support offered to archives will be."

In view of the importance attached in the submissions to the need for a more extensive network of regional and local archives throughout the province, a detailed proposal for a regional archives system has been quoted in full from the Nipissing Archives submission and is appended to this section (see 3.5 Annex).

iii) Resources and Efforts of the Private Sector

Archives pointed out that a more inclusive definition of heritage resources is needed, not only for the purpose of policy and program development, but to raise awareness of and participation in archival resource collection and management. As one writer stated:

> ... archives are institutions within an organization responsible for the management of historic records, regardless of form, and with them the organization's recorded memory. Archives can be seen as the keepers of Ontario's recorded memory....When an archives is also given responsibility for the organization's records management programme, the identification, use, and preservation of historical records takes on a new and dynamic outlook.
>
> Unfortunately this is not the direction which past developments in archives have taken. None of Ontario's traditional sectors have uniformly developed archival programmes, in spite of their obvious value, to manage their records and ensure that those of enduring value are preserved. Neither government, religious, labour, business, nor any other sector has taken a comprehensive approach to this vital area of management so closely linked to heritage. Records are often dumped on local museums, libraries or historical societies which do not have the funds or expertise required to look after archival materials, only a

> strong desire to protect local heritage. Irreparable harm may be done in spite of good intentions as records are considered for their value as artifacts by museums or are forced into library cataloguing systems which may obscure the provenance of the record and thus limit its informational value.
> (Southwestern Ontario Archivsits Association)

It was also of some concern that the lack of visibility and funding for archives has often meant difficulty in reaching small organizations at the local level who cannot afford professional archival help, and in training volunteers to care for community records.

An illustration was provided in another submission which argued for extending the boundaries of the heritage movement to include private groups.

> The religious of the Congregation de Notre Dame have lived in Westport, Ontario since 1886, having arrived via the Rideau Canal from Kingston. Last year they celebrated the Centenary of their foundation and 100 years of Catholic education for the benefit of the young people of the village and the surrounding area. The R.C. Continuation School (one of two ever set up in Ontario) closed in 1967 and this year the Sisters of the Congregation are withdrawing from the area. No record of these events will be kept in the village unless we as members of the Congregation de Notre Dame supply them for the library and the museum. We are leaving a plaque on the present school building.
> (Congregation de Notre Dame)

In the opinion of one writer, the private sector would be more closely involved in ensuring that archival resources are maintained if the repositories themselves were upgraded. For example, stringent federal guidelines must be met (i.e. security, environmental controls, access to documents, conservation programmes, professional staffing) before repositories are considered "Class A" under the Canadian Cultural Property Export and Import Act. This act allows Class A repositories to apply for 100% tax benefits for donors of archival collection to their repositories. It was pointed out that the private sector enthusiastically embraces this tax relief, and at the same time, priceless heritage collections are preserved for future generations; thus a small amount of funding injected into upgrading local archives brings great returns in the number of collections that could be attracted to these institutions through an ability to offer tax relief.

iv) Greater Public Awareness

Many submissions acknowledged the fact that the public seems "oblivious to, and ignorant of" archives and their contribution to heritage conservation. As one writer stated:

> People have finally become aware of the importance of preserving our architectural heritage through the publicity provided by LACACs, the publications and seminars made possible by OHF and especially because of the BRIC grant. Publicity in the archival world is almost "nil" except for the efforts of the few regional archives that have done so to help justify their existence to municipal Councils and several "Paper Treasures Festivals" supported by the Ministry of Citizenship and Culture. The festivals were excellent and definitely a step in the right direction.
>
> (Norwich & District Archives)

Praise for the Paper Heritage Festivals, and for their impact in raising local support and awareness, was strong. Conferences such as the 1986 "Paper Treasures" meeting were also welcomed, and it was suggested that these be held regularly. The province itself was urged to help make archives more "visible".

> ...Start at the heart of Ontario. Give the Ontario Archives a building that can be seen and easily identified by the public, with permanent display areas to bring them inside. Create and staff an education office in the Archives to bring in students, arrange tours and travelling displays. The Ontario Historical Society plays some of this role but not nearly enough is done.
> (Incorp Synod of the Diocese of Ontario)

Finally, it was pointed out that there were a number of ways individual archives could reach out to their communities, although it was acknowledged that smaller archival institutions may not yet have the capabilities or resources to undertake extended outreach or education programs

> Although archives are not necessarily seen as great proponents of public awareness or tourism, there is a capacity for this in every archives, if programmes are extended to enable this capacity to develop. Mobile displays, assistance in historic walking tours, brochures on points of interest, vignettes in newspapers or radio and TV, can all be products from archives, and enhance both public awareness and tourism in an area. In such ways, archives can address in a very positive way the "twentieth century alienation" mentioned on page 25 of your document. As our population grows older, genealogy and other such activities will inevitably draw more heavily upon archives as a leisure-time resource. "Elderhostel" programmes at universities are becoming increasingly popular, and frequently make use of archival workshops, appealing to senior citizens.
>
> Archival awareness is a matter as much of mind-set as of great amounts of resources, and changing mind-set, whether of a bureaucracy or of the public, is more often achieved by continuing public explanations and contacts than by huge injections of funds. Nevertheless, archivists need the wherewithal to continue this programme of educating their public, at least at a minimum level, which is presently unattainable for many archives without some outside funding.
> (Queen's University Archives)

v) Strengthen Professional Training

In a recent needs survey conducted by the Ontario Association of Archivists, archival institutions consistently listed education and access to expertise as the developments which would be of most use to them. Individual briefs and submissions reiterated these needs, citing conservation training and access to conservation labs most often.

Without derogating from the accomplishments of the OAA and other associations in providing training opportunities, one writer felt that a central, provincial coordinating body, with an adequate level of funding, could do a much more formal and comprehensive job of providing for the continuing education of heritage professionals.

> Regional workshops, seminars, and lecture series on specific areas of concern (e.g. conservation, reprography), sponsored by some overarching provincial body, would be tremendously beneficial to people. Heritage professionals include a disparate but often overlapping host of specialties. I think that there would be much to gain from a **cross-fertilization between disciplines**. To this end an **extensive and frequent newsletter** targetted at the whole range of heritage professionals would provide a very useful overview of what is happening in Ontario, especially regarding new technologies and techniques. This would be particularly valuable to smaller archives that often have to carry on a wide range of consultative functions.
>
> (Metropolitan Separate School Board)

The Ministry and other provincial departments were also urged to support and encourage efforts by archival organizations to offer volunteer training and workshops, and to recognize initiatives to establish graduate level archival studies in Ontario (for example, at the University of Windsor). As Canada's only post graduate program in archival science is offered by the University of British Columbia, one submission appealed for scholarships for Ontario students to attend.

vi) New Information Technologies

Archives were keenly supportive of any efforts to develop computer systems for use on a local or regional basis. Regional computer networks, it was observed, could allow for rapid development of linkages within areas, greater consistency of descriptive standards, and increased access to collections. More information was needed, however, on the relative merits of different systems and software.

A detailed proposal for the development of a basic heritage network was outlined in one submission and is quoted here extensively. It describes a system that would serve a variety of generic administrative and technical operations, applicable to archives, museums and art galleries, as well as LACACs and heritage organizations.

> These networks would share a library of similar software with programs of varying complexity and ability allowing for an individual institution's needs and the power of their equipment. This might include a collection management program (SPIRES or a PARIS modification); a word processor (Microsoft WORD or WORDSTAR 2000); a database manager (dBASE III+); a financial spreadsheet package (VISICALC, Lotus 123 or SYMPHONY); a graphic text and image formatter and an array of small utility programs.
>
> A wide variety of textual directories, electronic "user manuals", would be included, both on the operation of the system/software and on a range of museum interests. This would be an up-to-the-moment library of educational texts that could be accessed and "downloaded" by even the smallest user. The hub of the network would be an integrated bulletin board/mailing system/data interaction link that would allow messages, databanks, reports and software to be sent from user to user or around the country.
>
> Most archives and museums are members of regional organizations, many are near post-secondary institutions with mainframe systems with students in computer technology studies. A partial funding program covering the initial technical expertise, group memory "servers", an "in-watts" telephone

> number and individual terminal costs would allow each association to computerize on a region-by-region basis. Large institutions would be able to convert over easily following the tried-and-tested methods of those before them, hiring students from the nearest computer studies program. Smaller groups could sign-on in the beginning, using either their personal IBM PC - compatible home machines or "dumb" terminals with RAM-pack storage units, to download the bulletin boards and conservation texts. As they grew, they could upgrade to newer, more powerful equipment, turning their old terminals over to other groups and converting each museum task at their own pace.
> (Nipissing Archives)

It was acknowledged that because of high start-up costs, and the need for ongoing skilled resources, computerization may not be possible or necessary for every operation, or for very small collections; but even among those who choose to automate, there may be risks down the road.

> We run the risk of each partner in the heritage sector -- archives, museums and historical groups, moving apart as their own technology grows more specialized and incompatible. We will begin to stratify into national and provincial organizations; large or small institutions; groups with large urban resources versus the ghettoized hinterland. Already, due to funding allocations, non-provincial museums in the Maritimes and the Prairies have been squeezed off the PARIS (Photograph and Artifact Retrieval Information System) database.
> (Nipissing Archives)

It was concluded that although computerization is only one tool to "vitalize and project" our archives and museums into the future, a "basic network" will have many benefits.

> Our collections will be better organized, documented and used; our displays more professional; our budgets more detailed; our information available to anyone who wishes to know.... It will link the heritage sector together and allow us to serve the "Class of 2000" in a fuller way.
> (Nipissing Archives)

3.5.2 PROVINCIAL ASSOCIATIONS

One provincial association whose interests extend in part to the operations and services of archives responded to the Heritage Policy Review. That submission, from The Ontario Genealogical Society, is summarized below.

Ontario Genealogical Society (OGS)

On behalf of its nearly 5,000 members, the Ontario Genealogical Society, together with three branch organizations made submissions to the Heritage Policy Review.

Two major themes ran throughout the OGS submissions. First was the need to recognize that the preservation of Ontario's documentary history must become the responsibility and interest of all citizens and all levels of government. Documents held as government records, church records, and burial records are three forms of documentary heritage which should be routinely identified, copied if necessary, and preserved in archives.

A key concern of the Society was the need for protective preservation of cemeteries, cemetery records and monument inscriptions. The Society is currently undertaking a project to copy and place in archival hands the inscriptions on all gravestones in Ontario, many of which are in danger of deterioration through age, weather and acid rain, or loss through theft and vandalism.

The second, and related theme was the need for visibility and accessibility of documents and records, particularly those relating to family history and genealogical study.

> All archival establishments should be directed to make their records available to the public under carefully controlled conditions. The heritage that is the record of Ontario belongs to the people of Ontario. Records which have been closely guarded (for example, the records held by the Registrar General's office) should be transferred to the Ontario Archives and re-examined in light of new attitudes, new insistence on access and the new imperative to make the history of a family a part of today's living. Records such as these which have been denied to the public must be provided with a reasonable availability.
>
> (Ontario Genealogical Society)

The issue of accessibility was also of concern to reegional branches of the OGS who noted that research materials now held in the Archives of Ontario are often difficult and costly to access because of geographical distance.

> ...We should remember how difficult and costly it is for people who live at a from Toronto to use the Archives there. With an aging population, these problems will increase. Also, since the majority of our members are either retired, or are homemakers on a limited budget, it would be helpful if duplicates of microfilms were available in Regional Archive Centres, either on permanent or loan basis. Since many people are researching families who lived out of this ares, as I do, a microfilm loan system would be of great assistance. Such Regional Centres would be of great advantage to local and visiting researchers, and would also relieve pressure on the Archives of Ontario in Toronto.
>
> (Region IV, OGS)

Finally, the question of communication and cooperation between genealogical and other heritage organizations was raised. It was felt that much more could be accomplished at a local level to identify and protect endangered cemetery sites, and to share cemetery records, if such groups as historical societies, conservation groups, heritage professionals, museums and archives worked together with genealogical societies.

In summary, the OGS recommended to the Heritage Policy Review:

- that conservation programs be promoted through news media, as well as heritage organizations and Boards of Education, to reach the greatest possible number of people;
- that Ministerial powers to collect and preserve our documentary heritage be enhanced;
- that the documents in our heritage be accessible to the public by archival distribution;
- that cemetery records, on stone and on paper, be included with such records; and
- that co-operation be nurtured with groups of citizens already actively involved in conservation of records.

Proposal for a Regional Archives System (Excerpt from Nipissing Archives Submission to the Heritage Policy Review)

Let us start to implement the oft discussed idea of setting up a regional archives system. Start first with an enlarged microfilming operation, to organize on film those texts and indexes basic to Ontario's history -major personal papers, Indian treaties, important pieces of legislation, early and historic maps, settlement agreements and the like. Material, forming a core document library, that could be easily electrostaticly duplicated and placed around the province at certain archives or major museums and libraries. In time, this would be further augmented by more regionally-oriented provincial and federal material -land registries, city directories, "Goad" fire map diazios, census records and tax rolls. Undoubtedly, much of this material will have a genealogical basis but this will insure an early, dedicated audience.

Certain strategic locations, those having or are capable of enlarging their environmentally controlled storage areas, would be chosen as regional archival centres. Non-sensitive original documentation of that area would then be transferred back. Still owned by the Archives of Ontario, this material or it's microform copy would be locally stored and accessible. In time, these research centres would grow to shelter other more specialized collections (genealogical files, service/fraternal societies records, family and special interest group papers) that wished to retain their own managerial control.

They would be natural computer access centres, having terminals to the future national databases like C.H.I.N. and the settlement/ immigration/ photographic/ personnel directories and government record databases of Public Archives of Canada and the provincial archives. They would also house the memory "servers" for the regional computer network, allowing reachers, no mater how distant or handicapped, to search the collection's calendars.

I would warn against trying to serve this huge province with only a half dozen major centres. Distance cannot only be a matter of kilometers, like trying to serve the entire northwest region with one depot in Thunder Bay (better two or three smaller centres). It can also be an attitude as in the "mental" distance between Toronto and the Simcoe or Peterborough areas. Also, don't create a new regional centre in an area that already has a general archive, no matter how small. They can give you an instant working relationship within the district whereas you run the danger of nullifying their existence and alienating the local people.

Forming a highly visible regional archive system would have other far reaching effects. One could then legally demand that public records be donated to the semi-governmental repositories to be disposed of or saved as they decided. Municipal and township records, council minutes, non-active city records, outdated assessment and voter rolls, School Board files -all have been lost in large numbers because there has been no official depot for them. If need be, let them be sealed-but-safe from fire, flood and neglect. A third of North Bay's historical records were "spring cleaned" to the dump because a file clerk had no orders to do otherwise. Hamilton Public Library archivist Margaret Houghton's words stand true for many cities and archives;

> "The Library is willing to support a City of Hamilton Archives. Currently, the municipal records are sitting unattended. City Council is not knowledgeable in the matter and might be persuaded if authoritative pressure were brought to bear.".

Municipal tax grants might urge them to donate. The same should be allowed for the private sector. The few corporate and labour archivists that exist often slave to justify their existence to a bottom-line executive. Tax breaks would urge large companies and unions to retain and organize their files while rewarding the small businessman for surrendering his ledgers.

Even provincial ministries should be included. My archives openly contains a series of stolen maps, "donated" because the local office could find no one in Toronto with the presence to return them after they were [illegible] be microfilmed. Those we saved. How many thousands of documents have been lost because nobody was "told" to save our heritage?

Regional archives are a long range project, extending 5-15 years into the future. At present, most of our personal history is stored in small archives and museum collections (A.O.'s collection is roughly 80% of government origin, the P.A.C. is not far behind), often haphazardly, in pocr environments or underutilized. Not from any malicious neglect but because the Ministry will fund museums and heritage buildings but not archives or archival activities. Where does the Ministry think museumologists, conservation architects and historians go for their research? Buildings, "living history" displays and artifact collections are only the "bricks", we supply the "mortar" of authenticity and interpretation.

3.6. ARTS HERITAGE

While few in number, the submissions received from art museums and galleries, performing arts archives and provincial arts agencies and associations were representative of a widely shared concern for the recognition and preservation of our arts heritage.

As one arts archive stated:

> The record of arts of a nation is as representative and revealing a manifestation of that nation's philosophies, mores, tastes, life styles, attitudes and people as are government, educational, religious and business records, and the growth of Canadian performing arts companies and of their support by Canadian audiences since World War II is a remarkable social phenomenon. Brilliant and devoted Canadians, many of them not native-born, have contributed to the recognition, organization and presentation of Canadian artistic talent, broadening the national character immeasurably.
> (Canadian Opera Company)

The issue of preserving the documentary and other heritage of the arts is discussed in more depth in the summaries of submissions from provincial and national arts organizations and agencies. Other concerns relating to such questions as extending the boundaries of the heritage movement, strengthening professional training and increasing private sector support are outlined below.

3.6.1 DISCUSSION PAPER ISSUES

i) Boundaries of the Heritage Movement

A key concern among art galleries was the need for greater recognition of their role in the conservation and interpretation of Ontario's visual heritage.

> There is a need to identify and acknowledge the art and artifacts of today as tomorrow's past. This task is particularly complex for art galleries since the visual arts of today and the future include technological media, ephemera, works with built-in obsolescence, conceptual art works, performance art, installation art and process or event "happenings" as art. In many of these artforms, no object as such remains as a comprehensive reflection of the art. The challenge is to document and maintain records of this body of artistic thought and production for future reference regarding existing and future artforms.
> (Oakville Galleries)

And as another gallery stated:

> Art Galleries with collections have a major role to play as institutions that preserve and interpret our visual heritage. Although the Ministry funds these institutions through the Arts Branch, they are not really seen as part of a larger heritage network. Yet art galleries often fit into this network by working in collaboration with archives, museums and boards of education. They are the very institutions that serve as mediators, making the objects in the collection accessible to a wide audience.
>
> This effort should be recognized, encouraged, developed and funded by the Ministry of Citizenship and Culture not only through the Arts Branch but also through the Heritage Branch.
> (Art Gallery of Peterborough)

ii) Resources and Efforts of the Private Sector

As the result of available income tax deductions, private art collectors have been encouraged both to donate works to public galleries and to continue to acquire contemporary and historic works by Canadian artists. It was recommended therefore, that current tax deduction programs should remain in place, and be significantly enhanced whenever possible.

iii) Strengthen Professional Training

One gallery noted that there is a great need for planning and stability in the staffing and management of galleries. Ongoing, long-term and enhanced funding, primarily for staff, is an "urgent necessity."

> ...Funding for the preservation of our cultural heritage should not be on a project basis. A need for trained personnel in conservation has been met by a number of formal post-secondary training courses and the Ministry of Citizenship and Culture Internship programmes have provided much needed experience after formal education is completed. This funding programme recognizes the need on the part of graduates for further experience in the field. It also recognizes the desire on the part of potential employers to have experienced personnel, yet few career jobs are available. The professionals are trained and willing to do the work. There is a great deal of work to be done. But there are few resources to hire the people, establish the facilities, or acquire the equipment and supplies. The most significant gap is between the need for personnel and the lack of funds to hire them. Money is needed to create positions that need to be filled and there are qualified personnel available now to fill them.
>
> (Oakville Galleries)

iv) Increase Communications and Cooperation

A variety of other comments raised by galleries pointed generally to the need for greater communications and cooperation among government and non-government agencies in the heritage field. As one writer noted, there are a multitude of resources relating to heritage in our province, but there is also a lack of coordinated access to information about these resources. This might be alleviated by a "formal communication network and centralized information bank." And in other areas, improved communications could have significant benefits:

> ...Cooperation at all levels of government and interdepartmental cooperation for programmes and funding is also desirable. Incentives may be effective in areas such as post-internship positions creation, with decreasing support over the long-term where need is demonstrated. Shared personnel and/or facilities may be an option, perhaps through existing networks such as the Regional museum/gallery co-operatives. Dialogue regarding preventative conservation and elementary conservation methods cost little except to facilitate communication. A network of telefax machines, workshops, a skills bank and a buddy system between a larger and a smaller institution would also be helpful. Visible, formal lines of communication among government and related heritage agencies would be efficient. An inventory of existing resources and relationships, especially interdepartmental, would also be useful.
> (Oakville Galleries)

3.6.2 PROVINCIAL AGENCIES

- **Art Gallery of Ontario**

The Art Gallery of Ontario was particularly supportive of the Discussion Paper's "recognition of changing factors in Ontario fabric". The Gallery has already begun working with multicultural groups in the community to become more sensitive to their needs. A Gallery Task Force is reviewing the entire concept of "public orientation" and its practical application in its future expanded facility.

The Gallery urged more attention for the heritage value of public art collections. The AGO also recommended that consideration be given in the legislation to the preservation and presentation of archival and manuscript collections. Similarly, the status of archives should be recognized and incorporated into the definition of heritage property, as this resource provides an invaluable basis for research relating to heritage conservation.

- **Ontario Arts Council: To Know Ourselves (TKO) Committee**

The Ontario Arts Council has long been concerned with the preservation of the historical record in the arts, and in its submission to the Heritage Policy Review focused on the performing arts as illustrative of the long-neglected need for record preservation and archival management support.

Acknowledging that the performing arts are not easily accommodated in the terminology and concerns articulated in the Heritage Policy Review Discussion Paper, the Council's TKO Committee felt that arts and cultural heritage nevertheless must be understood far more widely. Future definitions of heritage must ensure the place of all art forms, including newly emerging artistic media and other means of artistic expression.

> Such a broadened concept of heritage can be understood if the Ministry takes the position that the value of heritage is not primarily a dollar/economic value. If that standard is used in relation to the performing arts, performance itself has no real dollar value to the province except for the obvious box-office, tax and tourist factors; when a performance is over it loses its "heritage dollar value" precisely because it is not property and not an artifact. One can collect objects in visual arts and place them in a museum or gallery, but performances are events, not objects, and their remnants are of little intrinsic commercial value. But does this make the performing arts heritage less valuable for the province?

One of the enormous problems faced by the performing arts, the Committee noted, is determining where custodial responsibility and financial responsibility rests for establishing and maintaining archival repositories. Theatre, dance, and music companies "whose mandate is to produce works of art, have no money, space, time, staff or expertise to properly preserve the two- and three-dimensional materials generated by their works." By the same token, the Committee warned, the dollars required for archival management will always compete unsuccessfully with those required for production and programming.

The TKO Committee urged the Ministry to take action in a number of ways, including:

- establishing funding programs for arts archives and archival activities;
- promoting arts heritage among archives, libraries and universities; and
- ensuring that provincial government granting programs for employment and training encompass arts heritage functions.

3.6.3 PROVINCIAL/NATIONAL ASSOCIATIONS

- **Associated Designers of Canada (ADC)**

The Associated Designers of Canada, while supportive of the Heritage Policy Review, believed that a comprehensive definition of heritage resources would be incomplete if it did not include the performing arts.

> ...The history of the theatre, ballet, dance, opera and music of the province deserve to be be protected and safeguarded just as much as any other aspect of the cultural heritage of Ontario. Indeed, because of the transitory nature of these arts, they may need more protection than other more physically enduring forms.

Noting recent archival and research developments in the theatre community, the ADC suggested that this kind of heritage preservation work should be acknowledged by the Heritage Policy Review.

> A recent development in the theatre community in Canada is the desire to record our present and make it at least partly accessible to those in the future. There are more archival videotapes of performances being made, more theatres setting up

> photo archives and the designers of Canada, through ADC, are beginning to assemble a slide library of Canadian design work. Indeed, there is a strong movement afoot to found a Canadian Theatre Museum and the University of Guelph is starting a research programme called the Records of Canadian Theatre. The foregoing is to illustrate the kind of heritage preservation work that we at ADC believe needs to be incorporated into the planning of Ontario Heritage Policy Review.

- **Canadian Theatre Critics Association**

The Canadian Theatre Critics Association noted with some concern the omission of Ontario's "theatrical past" from the Heritage Policy Review Discussion Paper. Observing that the theatre "has traditionally supplied a direct cultural guide to public interest and influences," the Association felt that

> An attempt to give our past a future that omits such sign-posts, declarations and influences, cannot, in our opinion, be accounted complete. Even the preservation of buildings devoted to such contributions is adequate only when it conjures the occupants. Which is more important, the opera house or the operas for which it is built?...As concerned citizens, we beg you to see that the performing arts of Ontario are given due recognition, to share in the future which our past has earned us.

- **Coalition for Arts Heritage Preservation**

The Coalition, a concerned group of nearly 400 individuals and organizations in the literary, visual and performing arts, has as its primary purpose to ensure the protection, conservation, celebration and interpretation of Canada's arts heritage.

> Canada's cultural history, more specifically our arts heritage, is facing a ....crisis. It is being forgotten, dismissed or far too often unintentionally destroyed. Much of it remains in private hands, unacknowledged, unrecognized and in

> imminent danger of being lost. A great deal which has managed to find its way into existing repositories rests precariously and inaccessibly. Parts of the whole have been separated, a disservice to the integral whole of collections. Those few collections which have managed to survive within the actual creating or custodial institutions, due to uncertain funding, are threatened daily with deterioration or extinction.

Noting that a systematic approach to arts heritage preservation is necessary to define roles and responsibilities, ensure training and funding, and encourage networking, the Coalition proposed the following principles for an arts heritage preservation strategy:

- Arts heritage preservation must be a declared integral component of governmental heritage and arts legislation with appropriate policies, programmes and funding the consequence.
- A systematic implementation of records management within all arts organizations must be put in place immediately to arrest the loss of the record from this moment forward.
- Cultural trustees must exercise their public responsibility to ensure the records management in cultural organizations.
- The arts community must be allowed to fulfill its responsibility for the preservation of our arts heritage.
- The provenance and providence of arts records must be respected and collections retained as an integral whole.
- Collections should remain at their point of origin or, where this is not possible, within the region.
- The arts community must have the support to take advantage of the efficiency and power of the emerging technologies in the areas of archiving, conservation, networking and distribution.
- It is not enough to store; rather, accessibility, opportunity for reflective and comparative study, and distribution must be components of the developing plan for heritage preservation.

- Consciousness raising of the importance of arts heritage preservation must be a consolidated effort between the arts community and government.

Arts heritage preservation, it was felt, must be a shared responsibility among both government and non-government sectors. Records management should be the direct responsibility of the artistic organization; funding for the provision and sharing of facilities, technologies and expertise must continue to be a government responsibility, acted upon by appropriate agencies, and overseen in the not-for-profit sector by the Boards of Trustees in public trust. As well, the Coalition recommended that Ontario Arts Council ensure that operating budgets of arts organizations allow for the systematic implementation of records management, and that libraries and universities become much more active as collectors and disseminators.

Finally, with respect to the Heritage Policy Review, the Coalition recommended that:

- The new Ontario Heritage Act must contain direct reference to the arts in Ontario;
- The new Ontario Heritage Act must ensure that arts records management be instituted and maintained and that formally constituted arts archival collections be acknowledged and directly supported; and
- The new Ontario Heritage Act must ensure the development, support and promotion of preservation and distribution technologies

- **Ontario Association of Art Galleries (OAAG)**

The Ontario Association of Art Galleries represents a variety of institutions across the province. Despite the diversity of membership, OAAG members "Share a common commitment to enriching the lives of Canadians through the development of...collections and the organization and presentation of exhibitions and educational programmes."

In its submission to the Heritage Policy Review, OAAG called for greater consideration for contemporary art as "a vital part of tomorrow's heritage", and urged support for the custodial function of public art galleries.

> One of the most important functions of a public art gallery is to preserve our artistic heritage through our collections. All other activities are in support of the collecting function; exhibitions build our understanding of the context of our artistic heritage and the interpretive or educational activities provide access to the research for both the collections and exhibitons. We must safegaurd and share our collections, research and expand our body of knowledge, provide preventative and restorative conservation.

Noting the results of a 1986 survey of OAAG members on conservation activities and staffing needs, the Association pointed to three large areas of need: stability, staff and cooperation.

Ongoing, long-term funding, primarily for staff, was considered particularly critical with respect to both planning and stability, as well as professional morale.

> ...The payment offered recent graduates for the internship programme is grossly inadequate and reflects upon the credibility of the profession and the field. Poor renumeration implies a lesser status for the occupation and the work performed. In effect, the employee is subsidizing the position.
>
> Ongoing long-term funding, primarily for staff, is an urgent necessity. Starvation level funding and staffing in public art galleries have created the statistics for the backlog of suffering collections and programmes. All artwork embodies its time. Our cultural heritage is at stake and we ignore its conservation at our peril.

Cooperation among all levels of Government, and interdepartmental cooperation for program delivery and funding was also considered imperative.

> In order for the aims in the discussion paper to be achieved, it is vital that the desire for their success be a conviction shared by other government ministries and that they be seen as priorities. Heritage is of importance to many other government ministries, including Education, Tourism, Consumer and Commercial Affairs, and the Ministry's own Heritage branch, and is a valuable resource for them.

Finally, OAAG recommended that the Ministry consider establishing an arms-length agency "with a specific mandate to deal with heritage-related matters."

> Many ministerial heritage-related functions could be consolidated and coordinated under such a special agency. This proposed agency could...look into investigating and securing the funding and technologies necessary to strengthen and reinforce the existing information and communications networks...This agency might deal with interministerial communications; public information such as a Participaction type programme for public awareness; and be an arbiter and advisory body on policy for issues such as taxes and tourism. This agency could also deal directly with municipalities as the most direct and responsive link with communities regarding heritage for issues common to all related groups including art galleries, museums, LACACS, etc.

3.7 MUSEUMS

Community museums, specialized museums, historic sites and villages, and museum boards and associations made written submissions to the Heritage Policy Review. Regardless of the specialized interests of these groups of respondents, their submissions tended to address the whole range of issues raised in the Discussion Paper, and are summarized together in the sections that follow. Comments or observations unique to one or another specialized group have been highlighted where appropriate.

3.7.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

The discussion regarding "gaps and inconsistencies" centred overwhelmingly on issues of public funding and program delivery.

A more equitable museum funding formula was called for which would allow some adjustment for small museums, and for those situated in remote or small communities. A revised formula, it was pointed out, should recognize differences in museum size, availability of funding from private and municipal sources, staffing levels and development potential, as well as location and population size.

Many pointed out that more operating and capital funding is needed for museums in order to provide stability for planning, to assist museums in meeting requisite provincial standards, and to help attract qualified staff. Numerous briefs pointed to the difficulty of raising funds from other sources to offset escalating costs of equipment and materials, operations and maintenance. One museum proposed a new financing structure, based on a shared-cost approach between governments.

> We urge the provincial government to work toward increasing government involvement in heritage resource financing. The federal Museum Assistance Programmes assist in capital development of large scale projects, but sustaining financing operations, especially staff training and salaries, is required. The federal government finances, in part, organizations (under) the Horizon Programme and heritage activities of native people and multicultural groups. Museums and other institutions which require buildings with scientific environments or with specialized requirements must carry significant maintenance and overhead costs not required of social clubs. We would ask that new financing policies for museums be negotiated which would integrate federal support, perhaps at a fixed percentage of operations -- for example:
>
> | | |
> |---|---|
> | . federal government | 15% |
> | . municipal government | 25% |
> | . provincial government | 40% |
> | . local fund raising | 15% |
> | . operations income | 5% |
>
> (Welland Historical Museum)

Some concern was expressed that limited public funding may be spread too thinly among competing museums.

> I have concerns that there are too many amateur museums in Ontario that essentially duplicate an experience. Community museums need to be more sophisticated and larger operations that are seen as a fundamental part of a community, an economic as well as a cultural resource. The museums that have come of age need to be assisted to move to the next level to make them more viable attractions. This may mean that the Province cannot spread its financial resources among so many museums in Ontario. Greater resources put into fewer institutions might be much more productive than the present approach.
>
> (Lennox & Addington County Museum)

With respect to questions of program delivery and accessibility, the Ministry was urged to expand its own staff in order to respond to an increasing demand for advice and assistance.

> The Ministry of Citizenship and Culture's Museums Section provides me with excellent service, advice, and assistance. However, they are understaffed and overworked. Your standards for community museums in Ontario cannot be followed without dedicated manpower on your end.
>
> (Woodstock Museum)

The inadeqaucy of resources available for the delivery of heritage programs through the Ministry's regional services in Northern Ontario was noted. It appeared that recent reorganizations and reassignment of responsibilities between some Regional Offices had not been communicated adequately to clients.

> This results in confusion for clients of this Ministry as we are told to go through our Regional representative who has an extremely large area to begin with to cover and who does not have the staff, time or funding to visit the client during program organization. Contact is made by phone or letter which then has to be approved by the Toronto office, who again goes through the Regional rep. By the time the client finds out that more information is required then it is too late to obtain the funding or the client gives up. Regional offices should obtain the necessary funding and support to service all its clients, not just the ones in the immediate area that can visit the office.
>
> (Museum of Northern History)

ii) Current Division of Responsibilities

Museums expressed strong views about the division of responsibilities between levels of government, and proposed a number of measures for improving the practice of heritage conservation responsibilities at all levels.

In general, the current division of responsibilities was considered "adequate for the moment." While municipal governments have an important role to play in heritage conservation, it was strongly felt that the province should not shift any further powers or responsibilities onto municipalities at this time.

It was felt that a greater effort should be made to encourage, direct, and fund municipal governments in undertaking existing heritage conservation responsibilities.

Too often, heritage conservation is a low priority in small communities, and especially in Northern Ontario. Many local governments in all parts of the province cannot affort the costs of acquiring, moving or managing historic properties and/or collections. As one museum explained:

> A perfect case in point is our Museum's efforts to salvage a large portion of an Historic Huron Village. It is currently being destroyed by township road construction. We have obtained the cooperation of the township but they are unable to provide much needed funding to help the Museum salvage what is left of this important village site. This brings us to the next point. In our attempt to react to this much needed excavation, we are, at the moment, unable to obtain necessary funding to put a field archaeologist and an assistant in the field to supervise volunteer and other labour which is readily available for just such salvage excavations. I am hoping to cover the costs through a skills training grant from M.C.C. but it will be weeks, even months, before an approval of this can take place. We need a source of funds to permit heritage organizations to excavate sites.
>
> (Huronia Museum/Huron Indian Village)

Municipal governments, it was felt, should declare a stronger interest in heritage conservation by including provisions in official plans for the conservation of heritage properties, and for the ongoing maintenance and protection of designated sites. It was acknowledged, however, that it may be difficult to plan for the protection of archaeological resorces at the municipal level.

> Essentially, the exercise boils down to who is going to pay for heritage preservation. Most municipalities do not have heritage resource planning instruments. Moreover, I am not about to publicly announce in local planning documents the location of all archaeological resources. In fact, in most cases, we don't even know whether or not archaeological resources exist on a given property

> or not. Thus Municipal planning for the protection of archaeological sites is at best a difficult thing to do. My recommendation would be to provide certain regional museums who specialize in Indian history to conduct archaeological resource management activities within a defined area of the Museum.
>
> (Huronia Museum/Huronia Indian Village)

It was sometimes noted that if municipalities are to exercise existing responsibilities for heritage conservation more effectively, municipal representatives will require greater access to training, advice and expertise in heritage matters.

> Heritage... is not a concept that is well understood by the majority of local administrators and councillors. Heritage is not generally seen as important nor essential to social and economic life. There is a need for continuing education of municipal representatives if heritage is to become an integral part of local value systems and heritage resources are to be effectively administered.
>
> (Lennox & Addington County Museum)

One writer suggested that heritage seminars and study tours for councillors and administrators could be beneficial in demonstrating first-hand the achievements and experiences of other jurisdictions.

LACACs were also urged to play a more prominent role in promotion and education. In some cases, it was pointed out, LACACs have an image of being "unreasonable" and elitist. It was suggested that their role could be strengthened and improved if they coordinated efforts more closely with local museums, libraries and heritage organizations.

It was widely felt that the provincial exercise of responsibilities in heritage conservation should be improved. Clearer governing policies and guidelines are needed in order to promote and ensure a basic level of achievement in all communities.

> There are many issues which require the support and involvement of the province in the museum community -- conservation, staff training and development; standards for collections management; exhibitions, public and educational programming; the promotion of increased public awareness of the role of museums in the broader heritage community; improved co-operation and communications with other provincial ministries including the tourism sector as well as the formal education community; and the establishment of stronger and more effective links with museum programmes of the federal government and with other elements of the heritage network throughout the province.
>
> (Region of Peel Museum Board)

Finally, museums criticized the lack of a mechanism for provincial and federal heritage designation.

> The practice of leaving all the responsibility for protection to the local municipal councils is basically unfair (particularly when the site is of national and/or provincial importance). Canada is unique in this regard and certainly the lack of an appropriate provincial designation procedure is unacceptable to any thoughtful citizen...
>
> It follows from above that the lack of some form of protective designation for national historical sites is a national disgrace. Given the example of the recent demolition of the Mint in Ottawa, federal ownership is not a viable alternative. The province should put pressure on the Federal Government to act.
>
> (Mississippi Valley Textile Museum)

iii) Boundaries of the Heritage Movement

Museums argued for an expanded definition and understanding of heritage, and a formal determination of which additional or non-traditional heritage interests should be considered for support and protection.

Areas considered worthy of collection, study, conservation and interpretation included the traditional and living arts, as well as industrial heritage and work traditions. It was suggested that industrial archaeology and labour history should be included in the latter category, and that a revised heritage policy should encourage the preservation and adaptive use of our industrial built environment.

iv) Increase Communications and Cooperation

The idea of strengthening cooperation and coordination among heritage agencies at the local and regional levels was explored in many of the museum submissions.

A number of proposals called for the development and funding of regional conservation centres as a cost-effective way to serve the needs of local museums, archives, libraries and galleries. On the broader issue of regional planning and development, a network of Regional Advisory Committees was suggested. These could serve to facilitate regional development and cooperation, and provide advice to the Minister on issues facing museums, galleries and archives in a given geographical centre.

v) Strengthen Professional Training

Concerns in this area were equally divided between needs for professional education and development, and the problems of low salaries and limited job opportunities. As one writer put it:

> Training and education of paid and unpaid staff to ensure heritage resources are properly preserved and interpreted is important. The Ontario Museum Association is presently doing an excellent job upgrading museum workers. The Province did museums a favour when operating standards were implemented and tied to funding criteria. Perhaps the challenge is not so much strengthening professional training opportunities as it is upgrading salaries

> and developing public acceptance of the museum field as a legitimate profession so that people with professional concerns are attracted to it. I have a problem with the heavy emphasis on volunteers in the museum field. Municipalities tend to see volunteers as a substitute for providing legitimate, reasonably well paid jobs. Volunteers are not perceived as a means to enrich museum activities. Instead, they are seen as an operating alternative.
> (Lennox & Addington County Museum)

Others noted with concern that funding can be found for some short-term programs, but not for new staff for ongoing programs.

> Job creation and staff training policies and programmes should take into account the needs of heritage institutions which require staff with specialized skills. Now, most training and job placement programmes are 16 to 20-weeks duration. Since most museums cannot afford to hire staff, without some form of subsidy, the newly trained worker finishes their grant project and is forced to wait, unemployed until eligible again for more training projects at the museum -- all the while the museum is spending time and effort training new inexperienced workers who fit grant project criteria.
>
> The provincial government policy should state clearly that heritage institutions have special needs and should receive special consideration in the application of grant eligibility requirements. For example, work placement extensions might be granted for those grant-workers who have finished their training weeks.
> (Welland Historical Museum)

The problems encountered by smaller museums in staffing and training, particularly in northern Ontario, were highlighted in a number of submissions.

> Smaller and mid-sized institutions should be eligible for half-time intern trainees. In many instances, institutions cannot afford a full-time intern even if the "20% of wages plus benefits" costs borne by the institution are split between two fiscal years. If it is argued that the Intern Program is intended to provide specialized training for museologically trained students, then the

> program is designed to serve the south and an alternate program should be designed to assist northern institutions. This northern program could have on-site training requirements but should also build in off-site or OMA correspondence course training, a "half-time work over two years" clause, and a small amount of funding to defray the cost of materials used by the trainee. Such a program would serve to increase the pool of trained museum workers in the north, and would be far more attractive to northern institutions than the present Intern Program.
>
> (Sault Ste. Marie Museum)

Limited resources, and remote locations hinder museum professionals from participating in training and professional development workshops. Some felt that resultant collegial isolation among northern museum workers could be reduced by increasing training and travel funds, and by covering accommodation and transportation costs at a higher percentage than is currently provided. Other suggestions included regional training centres, or seminars "brought to the people" by professionals aware of the structural and funding limitations of small museums.

vi) Resources and Efforts of the Private Sector

The use of tax and other financial incentives was generally considered the most useful and efficient way to secure the resources of the private sector in support of heritage conservation.

The tax system, it was felt, should be used to provide incentives for various types of private support, such as tax-deductible contributions of volunteer labour, and donations to endowment funds which could be matched by the province.

Non-tax incentives were also encouraged. For example, it was suggested that awards and honours for individual efforts in heritage conservation should be explored, and eligibility for grants under the Ministry's Preserving Ontario's Architecture program should be expanded to include non-profit organizations created locally for the purpose of preserving built heritage and historic sites.

vii) Public Awareness

There was widespread feeling that one of the most pressing challenges for the heritage movement today is to provide better public education.

Museums argued for greater recognition and encouragement for their role in raising public awareness of heritage conservation activities and achievements.

> Museums can provide this key role of heritage education with a little encouragement and incentive. First, we need a new perception of ourselves, to work from underutilized strengths, rather than what we have always known ourselves to be.
>
> Museums can play more active, vital, and changing roles if they are encouraged to leave their primary emphasis on collections and their intrinsic worth, for avenues of research, local history storyline, interpretation and presentation of heritage findings, whatever their origin and background within the growing field of heritage preservation.
>
> The local community museum should be the central interpretation point for enhancing public awareness of all heritage activities underway in the community.
>
> (Lambton Heritage Museum)

Support is needed to assist museums in providing educational programs. Tax exemptions for the purchase of educational materials by museums were called for, as were funds to enable summer programs and other opportunities for children at low or no cost. Assistance is also needed for staff training and job creation in educational program delivery.

> The schools hold the key to the future of heritage awareness. Access to the school can be improved through programs explicitly designed to develop liaison between museum and educators, to train museum workers in developing and implementing interpretive programs. Support is needed for three to five year program with funding for one individual to serve as Education Co-ordinator over the project's run, and for a mixture of part-time or full-time staff on short term contracts to

> implement the program. The inclusion of part-time staff would enable museums to take advantage of the program to train and work with seniors and recently retired workers, who would subsequently be available to them as members of their volunteer corps. This program could be linked to the Ministry of Citizenship and Culture's volunteer program in many communities, strengthening museums, the volunteer system, and the educational program simultaneously.
>
> (Sault Ste. Marie Museum)

The Ministries of Culture and Communications, and Education were urged to work more closely with local school boards in recognizing and promoting local heritage facilities and experiences, with particular emphasis on a broader understanding of the role of museums.

> As public museums should be enabled to serve everyone, all persons in public administration, whether municipal, provincial or federal, should be helped to see the value of museums so that when they are called upon to give support to them, they will do so. It is not enough that only such departments as education and culture feel a responsibility for museums.
>
> Toward this goal, I would recommend that the Government of Ontario, working in conjunction with the municipalities through the museum community, develop a ten-year program that will be directed toward making museum services recognized by the Ontario public as essential to the life of a community as its public libraries. At the present time, the museum is regarded primarily as either a place for a recreational visit upon occasion, a compulsory visit with a school group or a tourist stop. It is my belief that eventually the museum will become a centre for serious self-motivated study by an increasing number of people and that this will contribute greatly to the advancement of Canada as a nation giving its particular quality of leadership to help protect the planet and advance mankind.
>
> (Museum of Promotional Arts)

A more concerted effort is required, in the opinion of many respondents, to actively promote and "market" heritage conservation. The same techniques as the "Participaction" and "Ontario, It's Incredible" campaigns could be used, together with demonstration projects such as the rejuvenation of a heritage building, or pilot projects such as the establishment of an ecomuseum.

> It is often taken for granted in a community, or amongst society at large, that someone is looking after our heritage so that future generations will have access to it. What is not known, however, is just how far-reaching our heritage is, and how invaluable and irreplaceable it is once lost, and the amount of money and expertise required to preserve and promote it. By promoting the fact that heritage simply belongs to the "people", and as heritage conservationists we are simply the keepers of their past, for their future, public awareness and appreciation could be increased. This idea must be spread by the government and by agencies which are involved in this process, through advertisements, increased funding, and basically taking it to the public at large, getting more and more people involved.
> (Northwestern Ontario Sports Hall of Fame)

While not wishing to criticize the current efforts of governmental agencies in promoting heritage conservation, one writer observed that MCC in particular should have a higher profile throughout the province. Often, only the heritage conservation community is familiar with its role and programs.

viii) Heritage Conservation and Tourism

It was widely acknowledged that tourism potential could be greatly enhanced through a greater recognition and promotion of heritage sites and museums, but this effort should come from the province in the form of more marketing and promotion assistance. Small museums are at a particular disadvantage; they are often overlooked both by municipalities and ignored in provincial tourism promotion campaigns.

The Ministries of Culture and Communications, and Transportation were urged to cooperate more closely in reducing the cost and "red-tape" involved in erecting highway billboards, and in removing restrictions on attaching promotional information to street signs. MCC was also encouraged to re-publish its directory of museums, historic sites and plaques. The plaquing program itself should be given more funding, and coordinated with local and other provincial and federal programs to "eliminate duplication and confusion".

Area, regional or county-wide cooperation among heritage institutions could also contribute to more effective promotion of a given tourist area or route to visitors. The eco-museum concept was explored in detail.

> The ideal of establishing a regional or county-wide "eco-museum" comprising all heritage resources in an area and constituting a major tourist attraction of regional or even provincial significance is a goal which should be worked toward. Many of these co-operatives are already in existence and operate at various levels. This "eco-museum" is a museum comprising a large geographic area and consisting of all the artifacts/features which help to explain/interpret the history and development of the area. It can include a series of museums or interpretive centres, historic structures, landscapes, activities, programs and other features. The combined potential of the regions' museums and historic structures is far greater than the individual importance or potential of any one of them. ...Further, it will market the county's heritage opportunities as a whole, increasing the tourism potential for all component elements. The eco-museum would feature a common graphic image, logo catch phrase, admission fee structure and other marketing elements. The museum administration would work closely with provincial and county tourist agencies. Another vital part of the eco-museum would lie in the upgrading of existing museums and the encouragement of complementary attractions. Education, a most important element of heritage, would benefit from this increased exposure.
>
> (Ameliasburgh Historical Museum)

ix) World Heritage Convention

In commenting upon the implications arising from Ontario's responsibilities under the World Heritage Convention, one writer concluded that as a province and a network of communities, we are currently falling "a little short of our commitment."

> ...First of all, our levels of government must somehow show a greater amount of leadership in assuring that heritage has a function in the life of each and every community... In order to do this there must be more support, both financially and morally, given to endeavours undertaken by individuals in a community to preserve whatever portion of their heritage they are attempting to preserve. Be it the large museum situated in the provincial centre, or the group of individuals who are trying to start a movement in their own little community, both must be treated as equals, both in financial needs, and public support.
>
> ...It is a difficult thing to be growing up in a rapidly advancing society, such as Canada is, as there is a desire on the part of many to simply keep up with the times. If one considers, however, the importance that heritage, both tangible and intangible, plays in nations much older than us, it is all the more reason for us to begin now to preserve what we have and ensure that it will be a part of our ongoing lives.
>
> (Northwestern Ontario Sports Hall of Fame)

3.7.2 PROVINCIAL/FEDERAL AGENCIES

. National Museum of Science and Technology

The National Museum of Science and Technology encouraged the Heritage Policy Review to give greater prominence to Ontario's leadership and achievements in engineering, science, technology and industry, which form an extremely important part of the province's heritage.

A higher profile for our scientific, technological and industrial heritage could be attained in archives and museums through a greater emphasis on preservation and rehabilitation of the built environment, and the undertaking of industrial archaeology tours, publications and commemoration, and educational television programs.

- **Ontario Place Corporation**

Ontario Place Corporation is the custodian of a naval memorial, the H.M.C.S. HAIDA. Commenting on the Discussion Paper, Ontario Place noted:

> The increasing multi-cultural character of the Province presents interesting challenges. Multi-culturalism has become a distinguishing characteristic of our Canadian society. Coupled with this, it is felt that strong efforts in education, civics and cultural affairs, tourism and recreation, inter alia must be made to create and awareness of the cultural and historic roots of our province as a whole.
>
> All the citizens of Ontario should have a basic appreciation, not only of their family cultural heritage, but also of the aboriginal heritage, and the long-standing customs, traditions, values and history which have culminated in our unique society.

With regard to issues of inter-agency communication and cooperation, the Corporation urged the establishment and promulgation of priorities for heritage conservation, so that affiliated associations and authorities are aware of the "overall agenda."

Any requirement for "new coordinating mechanisms" should be carefully scrutinized. New agencies inevitably mean major new expenses for staff and facilities. It was suggested that the adaptation or strengthening of existing organizations such as the Ontario Heritage Foundation might be more efficient and economical, and might serve to direct resources more productively toward "front-end operational activity" and away from administration.

- **St. Lawrence Parks Commission**

Upper Canada Village, Fairfield Historical Park, and Fort Henry made written submissions that focused largely on their dual roles as historic sites and heritage conservation centres under the Ministry of Tourism and Recreation.

Fort Henry felt the omission of any reference to MTR in the Discussion Paper ignored the important role that this Ministry plays in "the business of museums and heritage conservation."

Upper Canada Village, on the other hand, felt that provincial heritage institutions and organizations are receiving differential recognition and treatment according to which Ministry they are aligned with. Historical sites that have been "lumped together as attractions under the Ministry of Tourism and Recreation" get little recognition for their heritage conservation, collection, research, education and training activities. Nor are they eligible as bona fide museums for MCC funding. Instead, they are considered for their contribution to tourism, and evaluated on the basis of attendance, revenues, entertainment and recreational value. As Fairfield Historical Park pointed out:

> The activities of responsible stewardship of heritage resources are unrecognized and, as I've experienced, there has been no encouragement or interest from MCC to foster appropriate programs. Endorsement of stewardship and active cross compliance are needed.

Upper Canada Village concluded:

> If the heritage of this province is important, then those institutions who are tasked to collect, conserve, study and interpret it should be funded adequately, and joined to one ministry,... where the special needs of heritage conservation would be recognized.

3.8 ARCHAEOLOGY

The response from the archaeological community was widely representative of both professional and avocational archaeologists, and of such specialized interests as marine heritage, native archaeology, and the archaeological heritage of northern Ontario.

An overriding concern was the need to implement stronger and more effective measures for the protection and mitigation of archaeological sites. Other comments and recommendations reflected the general concerns shared by proponents of natural and built heritage conservation; namely, improving communications and cooperation among all "players", providing better professional education and training opportunities, and increasing funding for programs and activities.

3.8.1 DISCUSSION PAPER ISSUES

i) Gaps and Inconsistencies in our Current Approach

Judging from the number of comments and the strength of criticism, the major difficulty confronting the conservation of archaeological heritage is the lack of adequate legislation and policies to protect the resources themselves. One writer noted: "The Ontario Heritage Act regulates archaeologists; it does not protect the resources. It also emphasizes artifacts as objects, rather than archaeological sites as real properties, where the two should not necessarily be separated."

This issue is of particular concern where Indian burial grounds, skeletal material and artifacts are concerned. Neither the Cemeteries Act nor the Ontario Heritage Act which affect the disinterment and relocation of human remains and associated artifacts, refer specifically to

Indian people and their culture. Nor is there any formal provision for consultation with affected native groups regarding the approval process for excavations. Separate submissions relative to both Acts have been made by native groups, urging distinct legislative provisions for Indian burial grounds.

On the other hand, some briefs argued that the only distinction that should be made is between burials relating to the present people of Ontario and their known relatives, and those of a heritage or archaeological nature. The latter, it was felt, should be accessible for research and study.

> The cultural and biological information to be gained from careful and respectful excavation of archaeological burials and their scientific analysis is an integral part of the total story of Ontario's past. Consequently, archaeological burials are part of Ontario's heritage and must be considered to fall under the jurisdication of the Ontario Heritage Act. The present confusion between the Heritage and Cemeteries Acts regarding burial excavation is an untenable situation, and works counter to the interests of both heritage and cemeteries administration. The two acts must be co-ordinated so that the Heritage Act contains a clause of inclusion and the Cemeteries Act contains a clause of exclusion so that all human burials may be treated in an appropriate fashion, to the benefit of both Ontario's heritage and the personal and religious sensitivities of the people of Ontario.
>
> (Peter R. Ramsden, Ph.D,McMaster Univ.)

Some briefs argued that mechanisms for protection of archaeological resources in our current legislation are difficult to invoke, often do not result in conviction, and are known generally to be ineffective. One avocational archaeologist questioned whether existing policies provide for any formal archaeological surveys, or any other requirement to check with the Ministry regarding registered archaeological resources on properties re-zoned for commercial or industrial development. Another writer criticized the apparent lack of policies and procedures for implementing a "stop-work order" and/or the reluctance to use this procedure, which has resulted in the destruction of at least one site (Boyle-Atkinson) without adequate mitigation.

Although some noted that improvements in attitudes towards archaeological conservation could be seen in recent years, there were nevertheless,

> ...still a lot of people out there who never heard of the Ontario Heritage Act or the M.C.C. "It's only old Indian stuff, what's wrong with that." A further attitude was expressed by a young man I had met in the field some years ago. He told me that because he was in real estate, he could walk over any land and that he was only looking for "good things". When asked if he was aware of the Ontario Heritage Act, he replied "Oh yeah, they can go their way and I'll go mine".
>
> (Charles O. Nixen, Ayr)

It was one writer's view that there should be a formal program for educating individuals and corporations whose development projects may affect or even destroy archaeological resources. If landowners or developers can be convinced that they will not be impeded or prevented from carrying projects through, the results may be "mutually beneficial." However, a more urgent concern is the need for financial support to cover mitigation costs.

> Without funding, archaeology cannot exist in this province. At present, except for student dissertations and public archaeology megaprojects, the burden of funding archaeological work in the province is on the shoulders of the developer. It is just a matter of time before developers will refuse to fund further archaeology without some sort of commitment from the province. There is a definite need for a matched funds grant program, whereby the province and the developer would jointly fund archaeological assessment and excavation.
>
> (Gary Warrick, Toronto)

In conjunction with the above, it was felt that enforceable standards should be developed for the mitigation of archaeological sites. Failure to do so, it was argued, will result in the excavation of sites with no provision for washing, cataloguing, analysis, reporting, publication and curation.

Others felt that site protection could be improved by better policing of sites. Ideally, one brief suggested, this could be achieved by "breaking the huge areas government archaeologists have to cover into smaller areas, hiring more archaeologists, and teaching volunteers to do the bulk of site survey and policing of known sites." Another writer agreed, but was pessimistic about the ability to engage adequate numbers of volunteers.

> Perhaps what is needed is the deputization of ACOs, LACACs, and professional archaeologists to prosecute violators of the Act. Protection of archaeological sites from looting, development, or natural degradation also must be dealt with. LACACs or ACO's (Archaeological Conservation Officers) are probably the best solution to the latter problem. They are often local residents and can be on the spot in literally minutes in case of an emergency situation. ACO's should be provided with small stipends for their services. Volunteerism in Ontario archaeology is slowly becoming a thing of the past.
>
> (Gary warrick, Toronto)

Northern Ontario faces unique problems in the identification and conservation of archaeological resources. As the Ministry's field archaeologist for the north central region reported, the major threat is from land-based development, particularly in resource extraction industries such as mining and forestry. Mining activities, under the jurisdiction of Ministry of Northern Development and Mines, and formerly Ministry of Natural Resources, are currently exempt from environmental controls. And while efforts have been made to protect known archaeological sites under environmental guidelines for forest management, vast areas of the North, for which we have no archaeological information whatsoever, are being developed with no inventory survey or mitigation of heritage resources.

> In the review document, it seems to be assumed that an adequate database of archaeological sites exists for the planning of heritage management strategies. It cannot be emphasized strongly enough that no adequate inventory of archaeological sites exists for northern Ontario, and that no agency presently considers the collection of this essential background data to be part of its mandate.
>
> ..... we can project a rough estimate that there should be one archaeological site per 15.5 square kilometres, or at least 34,000 archaeological sites in north western Ontario. This is undoubtedly a gross underestimate, as there has never been a formal comprehensive survey....It does, however, give us some indication of the magnitude of the resource with which we are dealing. Inventory survey has been conducted on only an infinitesimal portion of the land base, and less than 4000 sites (about 12%) have been formally identified.
>
> As the primary purpose of the inventory of data is to permit adequate land-use planning, the first and major responsibility for this activity should rest not with the private sector, but with the government.
>
> (David Arthurs, Thunder Bay)

ii) Current Division of Responsibilities

A strong case was made for increasing the provincial role in archaeological conservation.

> Existing overview and "control" of archaeological activity in the province should be maintained by the province. It is only through a central organization that some continuity in archaeological planning, development and execution will be maintained. This is important for Ontario with its considerable size and range in population densities.
>
> The dispersal of archaeological responsibilities to the municipal level, in our judgement, presents considerable potential for the unequal application

> of archaeological concerns in the province. In addition, the resource base of many municipalities and townships is too limited to support in an effective manner archaeological programs in their respective jurisdictions.
>
> Decentralization of some archaeological concerns may be more effectively dealt with by the development of a county or district based archaeological program for most areas in the province.
>
> (Cataraqui Archaeological Research Foundation)

A similar case was made in Northern Ontario, where it was pointed out:

> The vast majority of sites... are located on Crown land, and do not fall under municipal jurisdiction (as an example, Thunder Bay District has only 19 municipalities -- the rest of this area which is about half the size of southern Ontario is unorganized). In spite of any interest they may have, northern communities can have practical commitment to only a small fraction of the total area of the north. Responsibility for heritage resources in the vast unorganized areas, therefore, must reasonably lie with the Crown.
>
> Some municipal level control might be appropriate (where municipalities exist, and where they gave the resources to take on control); however, in northern Ontario appreciation for heritage resources is still at a fledgling level of development, and has not yet developed to a stage where communities will take on this role willingly. The problem of lack of expertise in heritage matters in small communities must be taken into consideration.
>
> (David Arthurs, Thunder Bay)

Acknowledging the financial constraints faced by many municipalities, another writer felt, nevertheless, that increased municipal involvement in archaeological conservation was both possible and desirable.

> Certainly there is a need for increased involvement by municipalities in archaeological heritage conservation. This would include the implementation of the need for archaeological resource assessments prior to approval of draft plans of subdivisions and the need to develop

> standards for archaeological work and for qualifications for archaeological staff and consultants. There also must be policies and procedures for the review of performance of archaeological responsibilities by the municipality and its archaeological staff or consultants.
> (William D. Finlayson, Ilderton)

From the perspective of some native groups, the current division of responsibilities is unsatisfactory because there is no defined or established role for the native community in the management of conservation of Indian archaeological heritage.

> ... We concur with the discussion paper's call for joint development of heritage sites between and among the levels of government. We would urge the First Nation governments' participation be as equals in this process. As such, we approve the movement toward decentralized partnerships suggested in the discussion paper.
>
> It is for this reason we reject the suggestion, heard at one of the public consultation meetings, that the Act include some sort of expropriation powers for the Ministry. This would result in no partnership, but the high-handed dictation of one level of government to the others....
>
> ... Moreover, we feel that heritage sites on surrendered lands argue even more vehemently that such lands belong in First Nations control. We would have every intention of developing these as heritage sites, in co-operation with other levels of government. We would not, however, enjoy the situation of once more having the preservation of our culture dictated to us by external cultures.
> (Association of Iroquis and Allied Indians)

iii) Public Awareness

Many agreed that awareness of heritage is growing in Ontario, but that commitment to archaeological conservation is at best, precarious:

> Archaeological heritage is not a traditionally accepted area for support like the symphony, theatre, etc. which are struggling enough to secure funding from private enterprise. Funds are generally available only for few select developments related to tourism, and not for more

> general requirements such as survey and salvage. As in southern Ontario, mitigation of archaeological sites, let alone conservation, is seen as a hindrance to development, rather than a valuable community resource. Much more work must be done to emphasize the positive value of heritage resources to communities.
>
> (David Arthurs, Thunder Bay)

It was also acknowledged that archaeologists have not been very successful in promoting the discipline to a broader audience. In Europe, and countries like Japan, archaeology permeates everyday life through such means as news telecasts and film documentaries, public digs and open-air museums. One writer suggested that "Ontario could implement all of these programs if the province encouraged the private sector and existing public agencies (e.g. TVO, ROM, Ministries of Education, Tourism and Recreation) to join forces."

Another writer pointer out that the high cost of public educational programs and lack of Government funding made it impractical for local archaeological organizations to continue to offer them. On the other hand, there was felt to be considerable potential both for public education and archaeological conservation in the development of a network of regional archaeological centres, professionally staffed and well funded, for the study and interpretation of Ontario's archaeological heritage.

iv) Increase Communications and Cooperation

There was a widespread feeling that archaeological conservation efforts could benefit from improved communications and cooperation among governments and the archaeological community, the public and concerned heritage groups and organizations.

On a local level, it was often a question of encouraging opportunities for sharing resources and expertise.

> Many local resources already exist for the preservation of historical resources. Small museums, volunteer archives, historical collections in libraries could all contribute to our appreciation of the cultural mosaic we inhabit. The role of these groups would certainly be made much easier with more money (isn't this always the case?), but access to expertise is equally important. At present there is an active program of education and assistance for museums, and the Archives of Ontario is making tentative moves towards helping non-official and local archives with a similar program. .....The establishment of more formal links between these organizations and local government offices would also be useful. Drawing from my own knowledge, the regional archaeology offices are one group of agencies which often possess materials, conservation skills, and the preservation methods used for paper archives and book materials could be important to archaeologists. For example I have seen at least one serious article about the importance of considering preservation methods for field notes. Closer links between such groups would benefit all.
> (Marilyn Mackellar, Toronto)

Improved coordination of resources and efforts would have many benefits, from ensuring "cross-compliance" in government legislation, programs and decisions regarding heritage resources, to building on existing strengths at a community level. As one writer pointed out, "Formal links between concerned citizens, local groups and the government are an asset to government policy. Such links are most effective, however, on an ongoing basis. More established channels for communication would be helpful both to policy makers and to those who perceive a problem at its inception."

Some submissions emphasized the importance of a strong regional network of field offices to provide the needed channels of communication between public and private sectors.

> In my opinion, the regional archaeological offices are crucial to the continuing development and guidance of heritage conservation and appreciation within the structure of heritage programmes. The archaeological field offices throughout the province, and especially in the north, should be re-established and strengthened, with a reasserted mandate to provide advice and guidance to other government agencies and the private sector, to monitor sites, assist and regulate licenses and consultants, conduct inventory surveys and rescue excavations, and to continue the broad educational programmes that provide the public with access to many aspects of archaeology at many different levels. They also provide that presence, both in the local community and throughout the region, which is absolutely essential to the effective promotion of branch programmes, and protection of the resource. Northern Ontario archaeological sites cannot be conserved or protected from a desk on Bloor Street.
>
> (David Arthurs, Thunder Bay)

A number of proposals were made by native groups to broaden the base of representation in policy and decision-making, and to improve ongoing communications and cooperation. These included an annual forum such as an open conference involving the Ministry, the Ontario Heritage Foundation and native representatives; participation on a coordinating committee of the Natural Heritage League; and other formal advisory mechanisms, such as :

> An Indian Advisory Agency. The intent here is for an advisory "board" of Indian political and cultural leaders to be consulted regularly by heritage agencies and organizations. Appropriate actions by agencies and organizations can be reviewed, approved and suggested by our people, employing our cultural values.
>
> Consultation with Local Bands. As suggested for the Cemeteries Act revisions, the nearest band or closest cultural group to a site being contemplated for development must be consulted and all actions must be approved by them before implementation.
>
> Indian Participation on Local and Provincial Heritage Boards. The discussion paper suggested a variety of options for the formulation of

> overseeing boards. We would suggest that Indian participation at these levels would sensitize these boards to the First Nation perspective and help to institute responsible policy at the outset of heritage activities.
>
> (Association of Iroquis and Allied Indians)

v) Professional Training and Educational Opportunities

The question of professional training and development engendered much discussion on measures needed to enable and strengthen the practice of archaeology in general.

First, it was pointed out, a major problem lies in the shortage of experienced professional archaeologists, particularly in northern Ontario. Not only does this mean that a large area of the province is under-served, but that there are simply not enough suitably trained people to conduct surveys or excavations, to train volunteers and supervise field projects, and to organize opportunities in the form of "weekend junkets" and field trips.

> In this area, responsibility for guidance basically rests upon the two government archaeologists in Thunder Bay to provide any direction and supervision on excavations or field trips for archaeological society members and other volunteers. The local university has not become involved in the training of avocational archaeologists, and unlike southern Ontario, we "unfortunately" have no corpus of unemployed graduate archaeology students upon which we can draw to organize activities and provide supervision on projects. Absence of a graduate programme at the university forces archaeology students to move out of the region, and frequently out of the province, to pursue their education. Absence of jobs in archaeology gives them no incentive to return, nor does it encourage students from other areas (eg southern Ontario), to come into the area to do fieldwork.
>
> (David Arthurs, Thunder Bay)

One proposed solution was the establishment of an archaeological internship program, operated either through the Archaeological Field Offices, the university, or local museums. Alternatively a school of northern archaeological studies could be instituted to provide a centre for archaeological research and training. Other noted gaps in the teaching of historical archaeology, and in university level programs in anthropology/archaeology could perhaps be addressed through negotiation and agreements with formal educational institutions.

Other concerns were raised with regard to both basic and entry-level educational opportunities, and are paraphrased below:

- Continued support for training and upgrading the skills and experience of avocational archaeologists is needed. The Passport to the Past program is an important beginning;
- There is an urgent need to initiate training programs for individuals without formal training in archaeology before these individuals arae issued archaeological licences. These training programs should be taught by individuals with a Ph.D. and teaching experience in archaeology.
- There is a shortage of formal training in the areas of mapmaking, surveying and geomorphology - skills crucial for informed site excavation and interpretation;
- The Ministry of Education and school boards must be involved in the discussion of heritage concerns in the educational system. The quality of on-site teaching programs at the elementary school level should be improved. Such programs are rarely well-prepared. The teacher is often as much a novice as the students and the experience is not tied to the study of native heritage, historical materials or archaeological methods in the classroom environment. An on-site experience should be used only with classes who have been taught the significance of the site and should be followed by a post-visit session.

There was considerable debate regarding the question of licensing of archaeologists, and in particular, adverse reaction to a proposal that licences be granted only to archaeologists holding doctorates.

> When the Act was first conceived in the 1970s, I think that the professional people at that time had us, the amateurs, written off. They could not or did not wish to distinguish between dedicated amateurs and rabid relic hunters. This did not happen and I believe we have filled a role beneficial to the cause of Ontario archaeology. With new submissions to the review of the Act, the above attitude has been expressed by at least one professional in that amateurs should not be licensed. I find this hard to believe.
> (Charles O. Nixon)

Another writer concurred.

> The result of such a policy would be the forcing of avocational archaeologists underground and the total loss of information from this source. If the committee took the time to consult the files on known sites in the province of Ontario, I believe they would find that the bulk of the known sites were reported first by the avocational archaeologists and certainly the last four or five years with the expansion of the archaeological conservation program, the data reported by avo-archaeologists has vastly outnumbered the information reported by the professional community. What needs to be done is a strengthening of the avocational community and I believe this approach is starting to appear with the Passport to the Past Program being carried out by the Ministry and the Ontario Archaeological Society....
> (James Pengelly, Port Colborne)

One writer assessed the practical effects of such a change in licensing procedures.

> I feel that this attitude poses a threat to worthwhile iniatives such as the Ministry's own A.C.O program and the efforts of the Ontario Archaeological Society. I do not believe there are enough archaeologists with a doctorate in the province to cover the areas that these two organizations watch on a volunteer basis.
> (Oneida Council of the Thames)

And finally, the underlying premise for the proposal was questioned.

> This attitude also threatens to break the bridge in the gap between Native people and the archaeological community. The Ministry has demonstrated that we are capable of directing and conducting our own projects (without a doctorate) by sponsoring our projects and issuing licences. It seems that this individual either feels that the Minister made an error in granting funds to Native people or that we do not have the ability to conduct ourselves in a professional manner or in completing a professional job....
> (Oneida Council of the Thames)

A number of suggestions were raised for improving facilities, programs and procedures for archaeological conservation. First, it was pointed out that conservation advice was needed for archaeological excavators. While the Canadian Conservation Institute's efforts were welcomed, the increased availability of conservators, mobile conservation labs or localized facilities would provide a much greater benefit.

> Emphasis in the existing legislation has been upon the retrieval and reporting of archaeological resources. Increased attention must be provided to the conservation and storage of archaeological materials, to conform to standards enabling accessibility to the material by other scholars, for public displays and to other interested and authorized parties. Standards should stipulate guidelines for appropriate storage facilities to ensure proper conservation of materials and a central inventory or catalogue of materials. Copies of these catalogues should be maintained by the province for provision of a provincial inventory of archaeological collections.
> (Cataraqui Archaeological Research Foundation)

Second, while archaeological reporting is a condition of excavation in Ontario, it was noted that such reports are not as available as they could be. It would be helpful, one writer explained, if there were an index to reports on file, possibly on fiche. Moreover, since reports are "one person's view" of what the data show, the field notes and supporting data should also be available.

Lastly, efforts are needed to resolve current funding problems in archaeological research. Available research grants were described as "woefully inadequate" for fundamental studies relevant to the prehistory of eastern North America and in newer disciplines such as archaeometry. The Ministry, through the Ontario Heritage Foundation, was urged to underwrite such research to offset the shortage of funds from traditional sources such as the Social Sciences and Humanities Research Council.

vi) Heritage Conservation and Tourism

An uneasy tension was expressed between the recognition that increased tourism based on heritage attractions can benefit public awareness of heritage conservation, and the danger of commercializing those same resources.

One writer observed that:

> As odd as it may seem, tourism also poses a serious threat to the archaeological resources of the area. I have just completed an update on the nearly 300 known archaeological sites in Quetico Provincial Park. With the exception of the pictograph sites, which are on vertical rock faces, virtually every known site in the park is being destroyed by "camper erosion" -- the destruction of the surface vegetation through foot traffic, the erosion of the edge of the terrace as they walk up and down between campsite and canoe, the disturbance of shallowly buried archaeological deposits when digging a fire pit, a latrine, or trenching around their tent before a storm. As well, several campers have an insatiable urge to take home souvenirs, thus depriving the public of their collective heritage.
>
> (David Arthurs, Thunder Bay)

The opinion was often expressed that the primary value of an archaeological site or artifact is its scientific value, and that while it is certainly desirable to encourage development of some appropriate sites as heritage attractions, we must not permit archaeological resources to be exploited for their economic and tourist potential, without attention to their intrinsic value.

> In trying to envisage the worst scenario, then, we see heritage conservation surrounded by pitfalls, It can be impeded, warped or misguided not only by apathy and ignorance, but also by the influence of popular appeal (fanatical or otherwise), entertainment interests, profit and the wish to achieve it, and in government we must always add political opportunism. These are natural human inclinations to which we have already succumbed at one time or another, and to which we shall never be immune. As a result of them, unpleasant, seemingly boring, difficult or economically useless data, which abound and could be crucial to a balanced historical understanding, are liable to be ignored, overlooked or destroyed, while others become subtly changed to serve some specific purpose. In the process, essential functions such as preservation and systematic collection, recording and research are apt to be neglected in favour of more up-front "production"-type activities.
>
> To counterbalance and outweigh potentially biased influences we need a strong guiding principle. Personally, I would like to see this Ministry emphasize what they have rather quietly practised all along and have alluded to in the discussion paper by the terms "excellence" (p.3), "responsible use" (p.6), "stewardship" (p.21). I would like them to resolve that, toward the disinterested pursuit of truth and understanding in all generations, their intent, commitment and first consideration is to PRESERVE AND BE FAITHFUL TO THE PRIMARY EVIDENCE of heritage.
>
> (Anon.)

3.8.2 PROVINCIAL ASSOCIATIONS

- **The Ontario Archaeological Society**

The Ontario Archaeological Society represents some 800 members, organized under seven chapters across the province. Submissions were received from the Society and three of its Chapters and are summarized together.

It was felt that a much more forceful commitment from the province is needed to acknowledge the importance of archaeology in Ontario, and to support the conservation of archaeological resources, particularly in areas affected by extraction industries.

> The Thunder Bay Chapter is concerned that there seems to be little or no control over, or regulations concerning, extraction industries such as mining and forestry. These industries are causing ground-disturbance over a large area of the province and there are insufficient policies and archaeological personnel to oversee or control it. In the United States, on federal land, an archaeological survey is a necessity before any destruction of the habitat is allowed.
>
> We believe it is the mandate of the provincial government to protect and conserve these resources and not abdicate the responsibility to small towns or private interests in whose best interest this may not presently lie. If the provincial government really feels a commitment to heritage conservation, it has to be seen as a leader in the implementation and formation of such conservation - our heritage must be seen to be valuable.
>
> (Thunder Bay Chapter)

There was also some concern that the responsibility for archaeology should not be given to municipalities unless they can demonstrate an "abiding and long-term interest" and sufficient financial base to support the practice of archaeology. Where these conditions cannot be met, responsibility should remain with the province.

> Clearly, some sort of matching funds equation would have to be implemented in order to encourage the municipalities to take on the responsibilities in their area. Certain minimum requirements in terms of personnel, budgets, space allocation, support services and so on would have to be met by the municipalities. It is possible that certain areas of the province should be maintained by the provincial government, such as Northern Ontario, because of the lack of large communities and its scattered population. These municipal archaeologists would have to be answerable to their municipal councils but the councils' actions archaeologically speaking should also be answerable

> to the provincial government. We also recommend that the LACACs include at least one archaeologist on the board and that they should meet regularly and not at the whim of the municipal council as is the current situation. One last point to ponder is the definition of "municipality": for the purposes of the above discussion. For example, Vaughan is a municipality but it exists within the municipality of York. At which of these levels of government should the responsibility for archaeology rest?
>
> (Ontario Archaeological Society)

The question of LACAC involvement in archaeology raised the broader issue of the need for communication and cooperation between heritage groups at a local and provincial level.

> Besides giving LACACs a clearer role to follow in the Heritage Act (which directs them to be concerned with all sectors of heritage in their community), the revised Heritage Act should provide vehicles for the dissemination of information between the different sectors of the heritage community. Whether this takes the form of a newsletter from a Ministry heritage coordinator; or something more direct such as a Ministry sponsored annual heritage group executive officers meeting; or something more local such as county, district or regional local heritage group lists, is open to consideration and discussion. What is essential however is for the Heritage Act to recognize the very real need to emphasize communication and cooperation between heritage groups, and between Ministry personnel who manage the various heritage sectors. Co-ordinated heritage activities on the part of local or provincially based heritage groups can provide a greater profile within a given community... and gives the Ministry... a greater profile in provincial heritage.
>
> (London Chapter)

The need to improve interministerial communication and cooperation was also observed. It was recommended that the Ontario Heritage Act be redesigned to mesh more efficiently with those parts of other Acts which have a bearing on archaeological matters: the Cemeteries Act, the Planning Act and the Environmental Assessment Act.

> We also strongly urge that the ministries most prominently involved in activities which threaten archaeological resources, that is, the Ministry of Natural Resources and the Ministry of Transport and Communications, establish a regular and ongoing dialogue with the Ministry of Citizenship and Culture so that their activities can be co-ordinated where appropriate. These ministries should also seek to open and/or strengthen lines of communication with the Federal Government to assure that federal lands possessing archaeological resources in the province of Ontario are properly assessed and administered.
> (Ontario Archaeological Society)

There was some concern about the role and mandate of the Ontario Heritage Foundation. Clarification is needed as to "what it actually does, its criteria for funding projects, and its accountability to the public". In particular, it was felt that the OHF should:

- take a more aggressive stance in archaeological conservation, formation of standards, etc;
- extend programs of tax relief and stewardship to archaeological sites;
- take a more active role in acquiring archaeological sites;
- provide more internships and/or scholarships for archaeological research, and more publicity on the availability of awards like the Boyle Scholarship.

It was also recommended that the whole process of licensing be streamlined and made more responsive to the archaeological community. The current licensing process was considered awkward and lengthy, and outdated in light of the wide range and diversity of archaeological field work being undertaken in the province.

> ...Archaeological field work can now include research-oriented projects, mostly from the academic world; consulting archaeology, which has grown in response to archaeological concerns being identified in the latest versions of both the Planning and Environmental Assessment Acts; and conservation archaeology, which can and is conducted by both professional and avocational archaeologists. It is important to note that both

> the type of archaeology conducted under each of these three categories and the various individuals doing this work can almost be viewed as different "subsets" of the archaeological community. The needs, concerns, qualifications and abilities for each of these categories are strikingly different, but all three groups must apply for the same type of archaeological licence. This leads to a wide range in the quality of archaeological field work and reporting, with no clear way of determining quality, as it relates to either individual qualifications or type of archaeology conducted. Such an arrangement is worrisome, since the Archaeological Unit of the Ministry of Citizenship and Culture uses the existing licencing structure as a means of regulating the archaeological community. This means that Ministry staff members are asked to appraise quality without clear directives from the Act, while still having the potential to seriously impact individual archaeologists. For example, consultant archaeologists apply for "consulting licences", which enable them to bid for work throughout some or all of this province. Getting such a licence also means an individual or institution is placed on a Ministry list of licensed consulting archaeologists, which is sent out to firms needing to hire such services. Simply put, if one isn't on the list, one cannot earn a salary. For those individuals who draw their earnings solely from consultant work, the licencing process is a powerful regulatory system which impacts directly on one's livelihood, even though the process, as it now stands, is faulty.
>
> (London Chapter)

It was further added that the requirement to submit a report before another licence is granted should be applied more stringently, and that such reports should be made easily accessible to scholars, perhaps on-line with regional museums or other centres.

With respect to the question of archaeological "resource management," two issues were of concern. First, it was pointed out, there is a serious and growing problem of inadequate storage facilities for artifacts. A series of regional repositories to house collections of artifacts and serve as conservation and resource centres are needed in order to ensure proper treatment and accessibility. These centres could also provide conservation services to local museums and heritage organizations, and house archaeological reports pertinent to the region.

Second, a system of classifying sites hierarchically should be examined as a basis for projecting future funding needs for salvage or long-term protection. While the development of criteria for ranking might prove difficult, it was felt, nevertheless, that such a system may hold the most promise for saving as many irreplaceable archaeological resources as possible.

Finally, it was felt that the profile of archaeology must be raised in the early and ongoing education of children and adults. This should include such measures as:

- adapting educational curricular to stress our history and cultural heritage, and the importance or archaeology;
- increasing program funding for workshops, travelling exhibits, and audio-visual and print media packages on Ontario archaeology; and
- building archaeological interpretive centres to educate Ontarians and visitors as to the value of our archaeological heritage.

. Ontario Council of Archaeology

The Ontario Council of Archaeology is an association of archaeologists with Ph.D.'s working in universities and museums, whose primary interests are Ontario archaeology.

In the opinion of the Council, the most serious obstacle facing the discipline of archaeology in the province is the lack of clear unified government policy regarding the conduct of archaeology.

> ...This is exemplified by the multiplicity of policies and advice communicated to the practicing archaeologists by the Ministry of Citizenship and Culture and the Ministry or Consumer and Commercial Relations with reference to the application of the Cemeteries Act R.S.O. 1980. The resulting confusion has placed professional archaeologists in an increasingly impossible and prejudicial position. Current Ministry of Consumer and Commercial Relations interpretations of the Cemeteries Act could result in the expropriation of thousands of parcels of lands and enforce their maintenance as cemeteries. Quite apart from the social and financial implications of this impracticable position, these inhibiting Ministry of Consumer and Commercial Relation interpretations cannot but lead to professional archaeologists being denied access to private property throughout Ontario.

The Council pointed out furthermore, that:

> Under the current Ministry of Consumer and Commercial Relations interpretation, the landowner is required to register the presence of these human burials as a cemetery against his title of the land. This in turn requires the services of an Ontario Land Surveyor to define and sever the area set aside as a cemetery in accordance with the Act. It also requires the owner, or in his default the Municipality, to fence the area designated, to cut the grass and brush, and to prohibit its use for any other purpose. In the event the landowner defaults in this regard the Act stipulates that the municipality must accept this responsibility. At present, there is no certainty that this de facto land expropriation by the Ministry of Consumer and Commercial Relations falls within the terms of the Expropriations Act. In any event it is unlikely any landowner would agree to these draconian conditions.

In light of this, the Council added, the onus is placed upon archaeologists to advise landowners on whose property they seek permission to excavate archaeological sites of their responsibility under the Cemeteries Act should human remains be found.

> There is another serious consideration quite apart from the above. In the event an archaeologist attempting to comply with the Ministry of Consumer and Commercial Relations interpretation, requests permission from an owner he would be alerting the local farmers of the potential threat by archaeologists to their land title. When this came to the attention of the Ministry of Agriculture's local Agreps it would soon become common knowledge to the Agreps across the province and farmers generally. In that event, no matter how the problem was ultimately reconciled by the Ministry, farmers and other landowners across the province could not but remain reluctant to allow archaeologists on their land, no matter what assurances might be given by the incumbent Government of Ontario.

Until the situation is clarified, the Council has recommended that licensed archaeologists be given assurances that they need not take the action imposed upon them by the current interpretation of the the Cemeteries Act by the Ministry of Consumer and Commercial Relations.

Other key concerns centred around issues of licensing, funding, and storage and curatorial facilities. In the Council's opinion, the Ministry should continue to issue archaeological licences on the advice of the archaeological committee of the OHF. However, current licensing procedures and practices could be improved by:

- requiring a course of training approved by the OHF as a prerequisite to licensing for "unrecognized individuals";
- requiring standardized procedures (eg. cataloguing, curation, publication) as a condition of licence;
- requiring reports which meet standards set out by the Ontario Heritage Act as a condition of licence (and making those reports available to scholars); and
- improving the timing of licence applications and notification so that scheduled projects are not delayed.

The latter recommendation was also raised with respect to notification of grants. In addition, it was pointed out that current funding procedures do not provide timely support for archaeological salvage operations which arise on short notice. The Council felt that a non-lapsing reserve fund was needed to meet unforeseen salvage emergencies.

A further funding need was observed in the area of formal volunteer programs. Noting that a valuable contribution can be made by volunteers, the Council called for "qualified supervisory and training staff" and increased funds for programs such as Passport to the Past.

Finally, it was noted that archaeological materials now being collected in Ontario are not being properly housed, documented and curated, and are thus subject to loss, theft and deterioration. It was felt in the first instance that archaeological licences should stipulate a limited time during which archaeological material could be held by a licencee for private study. Thereafter, this material would be deposited in an appropriate repository with access for other researchers.

A longer term solution would involve the designation of a series of provincially-funded institutional repositories. The Council suggested that the Royal Ontario Museum, the Museum of Indian Archaeology, Trent University Archaeological Centre and the Archaeological Survey of Canada should be approached to ascertain their willingness to provide such a service.

. Ontario Council of Professional Osteologists (OCPO)

In June 1986 the Ontario Council of Professional Osteologists submitted a paper on "The Management of Unmarked Graves and Human Skeletal Remains in the Province of Ontario" to the Ministries of Citizenship and Culture, Consumer and Commercial Relations, and Health. The Council noted the difficulties encountered by archaeologists when dealing with human skeletal material found on archaeological sites, and recommended that the province

- centralize and simplify ministry procedures for dealing with human skeletal remains associated with archaeological sites; and
- provide for careful controlled excavation and subsequent scientific analysis of these remains.

The Council also recommended that the province not institute reburial of such remains as an unconditional policy.

While reiterating its 1986 position, the Council's submission to the Heritage Policy Review also called for the designation of human skeletal remains associated with archaeological sites as heritage resources under the Ontario Heritage Act. This would imply an exclusion for such remains under the Cemeteries Act.

> If osteal remains are designated as heritage resources they will come under the supervision of the Heritage Branch, Ministry of Citizenship and Culture. The Heritage Branch will require a clear policy for dealing with the remains in light of any instituted recommendations. The process of identification, treatment, and recommendations with regard to analysis and disposition will be implemented by regional archaeologists as representatives of the Archaeology Unit, Heritage Branch. However, we recommend that the Ministry create a full time position for a provincial osteologist to help deal with accidentally uncovered burials, to ensure a rapid and effective response to these discoveries, to help determine and monitor policy and to coordinate education and information programmes.

The OCPO emphasized its commitment to legitimate scientific and educational study of archaeological skeletal remains, and rejected any "universal policy of reburial either from present and future excavations or from extant collections."

> With regard to the question of reburial, it is OCPO's belief that heritage resources belong to all peoples of Ontario and we strongly support society's expressed need to know more about its past. In the case of material more than a few hundred years old, of important archaeological and scientific interest, where clear relationship to living peoples is distant, OCPO is very firm in asserting that reburial is not justifiable. In fact, in the past few years, discussions with many Native groups have resulted in the suggestion that a special repository be established for archaeologically important skeletal remains. Even when the individual identity or direct lineal descendants of the remains are known there may be cases where such knowledge does not preclude scientific analysis.

The Council maintained that while human skeletal materials must at all times be treated with dignity and respect, the disposition of particular remains must be resolved on a case-by-case basis "through consideration of scientific interests, the cultural and religious values of interested individuals and groups and the strength of their relationship to the remains".

Finally, the Council was concerned that the appropriate agencies who come in contact with osteal heritage remains be made aware of any revisions to laws and policies with regard to the disposition of such remains.

> It is important that the appropriate agencies, who come in contact with osteal heritage remains, be made aware of the revised laws and policies with regard to the disposition of such remains. We recommend that an ... education campaign be reinstated and expanded to make provincial and municipal police forces, medical officers of health, coroners (even though they have no direct concern), municipalities, developers and various other public sector agencies aware of the proper procedures. In addition, the general public should develop an enhance awareness of the legal ramificaitons of tampering with unidentified skeletal remains.

- **Ontario Marine Heritage Committee**

In February 1976, the Ontario Marine Heritage Committee submitted a paper to the then Ministry of Culture and Recreation regarding the preservation of Ontario's underwater historical resources. The Committee reaffirmed its 1976 position and recommendations in a submission to the Heritage Policy Review.

The Committee pointed out that Ontario's underwater archaeological resources are enormously varied, widespread, and of continental significance. These include submerged prehistoric sites, fur trade canoe routes, abandoned mines and quarries, abandoned harbours and harbour structures, debris associated with land sites, jettisoned ships' cargo and tackle, and thousands of ships lost on the Great Lakes.

Problems facing the protection of these resources are numerous. The Committee noted that in every waterway in the province, Ontario's underwater heritage is being disturbed and destroyed, primarily from looting and wreckstripping by divers. It was felt there is a general lack of understanding on the part of the public of the value of preserving these resources. Neither is there any practical method of regulating the destruction, let alone identifying and monitoring the resource.

In view of the provincial government's responsibility to "protect and preserve Ontario's historical resources", the Committee felt that underwater historical resources should be defined and given special consideration in the Ontario Heritage Act, and protection of such resources should be enforced. It was also considered important, although not sufficient in and of itself, to educate the public and in particular divers, and dive clubs, associations, shops and schools on such topics as moral and legal obligations, the historical importance of wrecks, alternative diving programs, and channels for the utilization of expertise within the clubs.

It was also felt that the province's role should be improved. Communications should be strengthened between the Heritage Branch and the federal Ministry of Transport and with other provincial ministries such as Natural Resources. And a provincial underwater archaeological unit should be established to:

- receive and record information on reported finds and do follow-up investigations where applicable;
- conduct ongoing research on the inventory of underwater historic sites in the province;
- design and implement research projects on specific sites; e.g. endangered sites and/or those of particular historical value;
- provide the means for the conservation of objects recovered during research operations;
- undertake the restoration and maintenance of underwater sites that are in danger of being or already partially destroyed;
- act as an advisory body to the government on matters pertaining to underwater historical resources; and
- design and initiate educational programmes and "alternative" activity projects for divers.

The Committee also felt that such a unit should include functional expertise in the following areas:

- the history of Ontario pertaining to its lakes and rivers;
- underwater archaeology;
- underwater photography;
- archaeological conservation;
- draughting; and
- basic underwater equipment technology.

Finally, it was suggested that facilities for the unit should include a conservation lab, office space, mapping and draughting space, artifact storage space, and equipment storage space.

- **Save Ontario Shipwrecks (SOS)**

Save Ontario Shipwrecks is a province-wide organization dedicated to the promotion and preservation of Ontario's marine heritage. Comprising approximately 350 volunteers in fifteen local chapters, S.O.S. conducts field projects which combine historical, archival and archaeological research. In addition, the organization conducts seminars, forums, lectures and other programs aimed at fostering an awareness of, and appreciation for Ontario's marine heritage.

SOS has taken an "educative approach" to counter the neglect and abuse of Ontario's marine heritage. Shipwrecks, in particular, have been the subject of a great deal of damage and destruction during the past seventy-five years.

> ...souvenir hunting and abuse by sport divers and others have been the single largest degradation factor facing these sites. A new wreck was found, and the sole purpose of diving was to see what "goodies" could be brought up. From dishes and tools to bits of rigging, anchors, winches, steam engines, fittings and cargo, little is left after a very short time. In addition to this "pot hunting", the manner in which the site is used causes damage. Dropping of heavy anchors onto and through the decks in order to secure the dive boat to the site, then tearing the anchor out has been very destructive, from ripping up a few planks, to tearing off rail sides of wrecks. These unnecessary and destructive activities should not be allowed to continue.
>
> The average sport diver is not destructive or malicious by nature, just misguided. When shown the error of their ways, and the destruction that they are doing to "their" dive sites by removing

> artifacts, the sport diving community has generally responded well. Unfortunately there are, and probably always will be others who just don't give a darn and continue to selfishly locate and rip off these sites for personal collections or financial gain.

SOS acknowledged other factors and constraints affecting marine heritage preservation. The most obvious and significant is the fact that these resources lay beneath the surface of the water in a hostile environment. Underwater work is physically difficult and dangerous; projects are expensive both in terms of time and equipment. There is by necessity a heavy reliance on volunteers to undertake marine conservation projects.

SOS praised the work of Ministry field personnel in encouraging the contribution of volunteers and volunteer organizations such as SOS.

> ...This is one of the strongest and most positive factors affecting marine heritage in Ontario today. Any policies and programmes which are developed by the Ministry should take this into account, and further this partnership arrangement.
>
> In order to do this, the Ministry needs to be seen to be committed to marine heritage at least to the extent that it develops programmes which are commensurate with the nature, quality and scope of the resource. As volunteers we need support in terms of training, advice, guidance, and equipment which can and should come from the Ministry's field personnel. The resources of the present marine program of the Ministry are spread incredibly thinly given the scope and potential of the resource.

SOS felt that, in addition to program development, provincial policies and legislation should be revised to more adequately address the particular needs of marine heritage conservation. A more coordinated provincial-federal approach was also urged.

> Federal legislation dealing with shipwrecks is oriented toward commercial salvage, and protection of the rights of owners. It requires that wrecks or wreckage which come into the possession of an individual must be reported to the "Receiver of Wrecks" for a ruling on the disposition of the salvaged material. In cases where there is or appears to be no owner or other interested party, the Receiver releases his interest. In an effort to protect our wrecks, the Provincial authorities must resort to claiming ownership by virtue of abandonment on Provincial Crown lands. This is awkward, ambiguous, and has never been tested in court. A change to the Heritage Act specifically dealing with shipwrecks and other marine sites within the boundaries of Ontario to the effect that five years after sinking, the wreck reverts to the Province, and artifacts can then only be brought up archaeological licence would clarify the situation.

It was acknowledged that such legislative changes imply enforcement, presumably under the terms of the Provincial Offences Act by peace officers who routinely patrol areas in which wrecks are located. But another enforcement issue was of concern to SOS:

> Another of the difficulties facing the shipwrecks in the Great Lakes and St. Lawrence River, is the American attitude of finders keepers which devolves from the old admiralty law concept. Significant damage is being done by divers coming across the lakes and rivers to strip our wrecks, aided by a loophole in our customs regulations which permits a foreign boat to enter our waters without checking into customs as long as they do not land. Consideration could be given toward requiring a stop at customs if diving operations are going to be carried out in our waters.

SOS strongly felt that while legislation and enforcement may serve as a "moral framework", the best approach is to bring heritage into the present life of Ontarians wherever possible. This would include such efforts as:

- the development of a single policy on heritage conservation to be integrated into each Ministry according to the impact which that Ministry's activities has upon the resource;

- a greater emphasis on heritage and history studies and on training in heritage fields in the formal education system;
- the development of the sport diving tourist industry with incentives or grants to promote the responsible use of marine heritage resources; and
- the encouragement of provincially supported camp grounds and parks in developing interpretive centres, programs and materials and in assisting the conservation of marine heritage sites by placing moorings and monitoring diving operations.

Additional observations centred on questions of organization and management of the resources. SOS would welcome, for example, the establishment of a group comparable to the Coordinating Committee of the Natural Heritage League to deal with Ontairo's marine heritage resources.

The availability and adequacy of formal training in marine archaeology and conservation was also considered to need improvement. Similarly, conservation facilities for handling artifacts were called for. It was suggested that existing facilities might be opened up to use by the volunteer sector acting under licence, but it was also felt to be important to require licencees to demonstrate that any proposed raising of artifacts is necessary for the protection of the artifact, or is in the public interest.

Finally, commenting on the possibility of self-licencing in the archaeological profession, SOS felt this would be "disastrous for the amateur or volunteer archaeologist in general, and for the marine program in particular".

> There are not enough professional marine archaeologists in the province to handle the needs of the resource, pitifully little is being done by universities to correct this situation, and as a

professional, an archaeologist has a conflict of interest between what is good for the profession (perhaps reducing and restricting volunteer involvement), and what is good for the resource. In our view, the licencing procedure is best left to an independent committee of government personnel, professional archaeologists, and lay people, and (we) recommend that the marine element of our heritage be represented on the committee.

3.9 NATURAL HERITAGE

Submissions were received from a variety of organizations and individuals whose concerns fall within the broadly-defined field of natural heritage conservation. The diversity of interests articulated in the submissions was far-ranging: from land and nature conservation, botany, geography and other land resource sciences, through landscape architecture, natural history collections management, and recreation and leisure studies.

A consistent theme ran throughout the submissions; that is, the importance of acknowledging the parity of natural and cultural heritage conservation in the development of public policy and programs. As one writer stated:

> It is important that this theoretical parity be translated into a consistent policy, and that natural heritage protection be afforded legal tools and levels of funding comparable to those available for cultural heritage protection. At a deeper level,... humanity is a part of nature and... culture is always the outcome of a dynamic interplay of human and nonhuman (natural) elements. Thus, "heritage" can never be adequately preserved through an exclusive focus on structures and artifacts taken out of their natural context. By the same token, natural "heritage" features have a cultural significance and relevance. Our recommendations reflect the twin concepts of the equal importance of natural heritage and the interpenetration of natural and cultural heritage.
> (Toronto Field Naturalists)

3.9.1 DISCUSSION PAPER ISSUES

i) Current Division of Responsibilities

Opinion varied as to the most appropriate division of responsibilities for natural heritage conservation. In view of the limitations of available measures to acquire or protect significant natural areas (e.g. conservation easements, zoning and other bylaws), some briefs proposed amendments to the Ontario Heritage Act to empower municipalities to designate natural heritage sites, just as significant structures can be designated as buildings of historic or architectural value. Under such a proposal,

> ...Landowners would be required to obtain a permit to alter or destroy designated natural features. Moreover, the legislation should stipulate that alteration of the property in question be prohibited during the period between the time when the "notice of intention to designate" is served and the time when the issue of designation is disposed of (one way or the other) and the appeal process exhausted. This latter provision is to prevent "pre-emptive destruction..." The legislation should, of course, be backed by adequate sanctions. Legislation of this kind would give agencies and organizations concerned with natural heritage preservation much-needed "breathing space" to mobilize resources for acquisition; to cite only two recent Metro Toronto cases, it might have prevented the Sunday-morning bulldozing of Walmsley Woods, East York, in 1980, or the draining of Centennial Swamp, Scarborough, in 1986.
>
> (Toronto Field Naturalists)

Others argued that the current division of responsibilities for conserving heritage property of natural significance could be improved by decreasing federal and provincial involvement, and increasing local private and public responsibilities.

> Municipalities should continue their present role with respect to heritage conservation and perhaps take initiative towards greater involvement. It is the municipalities who understand best the needs of the community and should therefore have more control over heritage conservation. Agencies such as conservation authorities which bridge the gap between the provincial and local municipal levels should perhaps be given a more significant role in heritage conservation, particularly natural heritage.
>
> (Long Point Regional Conservation Authority)

It was acknowledged that a more extensive network of local advisory committees on natural heritage issues is needed. Some municipalities have appointed Ecological and Environmental Advisory Committees (EEAC's) to advise on land use planning and management, and to record and delineate "Environmentally Sensitive Areas". One writer noted that in many ways, EEAC's serve a very similar function to that of LACACs, and recommended that consideration be given to expanding the mandate of LACAC committees to include natural heritage.

A stronger role in natural heritage conservation was proposed for the Ontario Heritage Foundation, particularly in the context of program funding. The Carolinian Canada program offered a useful model.

> The Ontario Heritage Foundation, along with the World Wildlife Fund (Canada) and the Nature Conservancy of Canada conceived and carried out the program. I want to reinforce the point that the Ontario Heritage Foundation has played a very important part in Carolinian Canada because of its ability to use its unique legislative and administrative structure for conservation purposes. Programs such as Carolinian Canada should become a normal part of the OHF program in the future.
> (Dr. Paul Eagles, University of Waterloo)

In the view of some writers, the provincial government should take a more aggressive role in the process of planning and controlling changes that affect the natural and cultural environment. In particular, it was felt that the province should exercise leadership in the planning of city growth to control urban sprawl and protect rural areas.

> The distinctive and beautiful landscape of rural southern Ontario is threatened by widespread development and "improvements". We are thinking of the widening and straightening of roads through towns such as King City, north of Toronto, and the destruction of roadside trees that are too often seen as a hazard to traffic rather than an integral part of the rural landscape.

> ....We need to establish generous green belts, especially around Toronto. Rural southern Ontario should not become so isolated from the city by suburban development that it fades like a distant memory from people's consciousness. Farms, farmsteads, and rural communities are part of our heritage and "pioneer villages" do not compensate for the loss of large sections of good farmland.
> (Andrew Stewart, Kathryn Mills, Toronto)

A number of submissions urged the province to draft legislation to entrench not only built heritage but also natural heritage conservation in the municipal planning process.

> The most important job of heritage legislation should be effective preservation. In addition to the preservation of individual sites and buildings, larger features such as streetscapes, neighbourhoods, and landscapes are a vital part of heritage. The importance of our history and environment at this larger scale is not adequately recognized in present laws.
>
> Moreover, master plans for archaeological, historical and environmental resources should be drawn up by regional municipalities and counties, as directed by provincial legislation, in order to adequately protect sites or mitigate the effects of development. These resources should be identified and their importance evaluated on a regional, rather than a piecemeal basis, well in advance of development.
> (Andrew Stewart, Kathryn Mills, Toronto)

ii) Increase Communications and Cooperation

As a proven approach to promoting private stewardship and cooperative partnerships among agencies and non-governmental organizations, the work of the Natural Heritage League was widely supported

> The NHL was formed in 1982. It was seen as a co-ordinating body in all natural heritage interests and initiatives. There are 25 agencies involved -- non-government and government.... We have all got the same strong motivation and have been able to work out successfully ways to buy and protect natural areas, many on the edge of extinction either through neglect or the threat of development. We have achieved together things that were impossible alone. For instance, land owner contact programmes which have led to (a) private stewardship of land (b) donations of land to the Ontario Heritage Foundation (c) awareness of natural heritage values. We have also promoted and funded projects involving natural heritage conservation, given loans to organizations who are trying very hard to save a special woodlot, marsh, orchid bog, or waterfall but who do not have the ready money and whose time is running out because of a pending development.
>
> Vision, energy and sheer determination have made the Natural Heritage League a success, albeit a modest one and the key to this, of course, is that we cut through the jurisdictional red tape, and bring a fresh approach to conservation of our natural heritage. So I stress the word "partnership" and ask that the OHF and MCC do everything possible to continue their marvellous support and expertise.
>
> (Coalition on the Niagara Escarpment)

The ideal of mobilizing resources from a broader segment of the public through a provincial version of Britain's "National Trust", or through local trusts, was also discussed.

> One very specific piece of legislation which should be considered with amendments to the Heritage Act is to enable non-government, non-profit organizations in the province to hold conservation easements. This would essentially allow the formation of "land trusts" in Ontario. Our examination of the private, not-for-profit sector in the natural heritage field in the United States suggests that land trusts operating at the local level are one of the most positive sparks in the whole conservation field. The function could readily be adopted by some local naturalists clubs if legislation permitted, and might also be useful on the cultural side.

> At the same time, this arrangement might take a greal deal of pressure off the Ontario Heritage Foundation's easement program, where numbers of easements are accumulating rapidly. The fact that such organizations still pay property tax in Ontario unless the sites involved are designated under the proposed "heritage lands tax rebate" program provides a useful constraint that will prevent abuse of the land trust concept.
>
> (Stewart Hilts, University of Guelph)

iii) Resources and Efforts of the Private Sector

In general, support was expressed for a variety of incentives to encourage private interests in heritage conservation. As one brief stated, "In other words help those who already want to protect their old houses, villages, natural areas but who simply do not have the money to do so."

The recent extension of the 60% property tax rebate for agricultural land to certain designated natural areas was applauded as a positive step, but it was argued that this should be further extended to include all land in a natural state.

Other proposed measures included an expanded tax incentive program for natural heritage. As one writer stated:

> The OHF has the legislative power to accept gifts of heritage, be it artifacts or land, often with significant tax benefits to the former owner. I would very much like to see this power expanded and broadened for the conservation of natural heritage. For example, I respectfully suggest that a majority of the land use planners are unaware of the existing program, and a communication effort is thereby desirable. A range of important ecologically significant lands could benefit from the full implementation of such a program. The tax relief for certain classes of land owners could help facilitate the long term protection of such lands.
>
> (Dr. Paul Eagles, University of Waterloo)

iv) Greater Public Awareness

Increased public awareness of natural heritage is needed, in the view of one writer, to overcome the limitations of current approaches to heritage conservation and the tendency to focus on the exceptional or "spectacular" cases.

> Local funding limitations and provincial priorities mean that often it is only sites of provincial or regional significance that will be preserved.... There is a danger that an exclusive focus on the rare, the unique and the spectacular will lead to locally significant sites, which might not fulfill the priority criteria, being regarded as "insignificant" and expendible. This is so, all the more, in the case of features such as hedgerows, swales, natural drainage patterns, old trees, etc.--features which are as much "cultural" as "natural" and which, especially in urban areas, provide a living link with the rich, organically diverse landscapes of the past (as well as providing countless other environmental... and ecological benefits).
>
> (Toronto Field Naturalists)

It was considered important, to encourage the appreciation and protection of natural heritage in all its forms. Public awareness and education could be increased by a variety of measures:

- publication of reports and educational materials on natural heritage topics;
- increased use of signs and identification in road maps of natural landscape features such as hills, bluffs, brooks, wetlands and woodlots that have local names;
- a program to expand parks and arboretum facilities in cities and to emphasize not only their aesthetic and leisure value, but also their contribution to air quality and pollution abatement (using Germany's Bundesgarten program as an example).

A broader appreciation of natural heritage would also lend support to needed public policies encompassing all aspects of natural heritage protection, including such considerations as:

- glacial landforms and highland topography embodied in systems of moraines, eskers and drumlins, as well as river valleys, glacial lake strandlines and former kettle lakes;
- primeval forested areas such as the Backus Woods, and even individual trees, which have a particular value as "living museums"; and
- urban natural watercourses, which face continuous threat of loss or diversion as storm sewers or concrete channels.

v) Heritage Conservation and Tourism

There was some criticism of the lack of recognition at all levels of government that heritage conservation is a "tremendous drawing card" for tourism. Greater emphasis on the natural heritage value of outdoor areas and provincial parks, and better interpretive facilities would attract additional tourists and provide a more enriching travel experience. And as one brief concluded:

> More specifically, the Heritage Act should link "natural" as well as cultural heritage and tourism by recognizing and protecting the scenic, recreational and aesthetic features of particular properties. The Ministry of Natural Resources, through its ANSI programmes with the Ontario Heritage Foundation have acquired two areas--Great Manitou Island and Fleetwood Creek in Victoria County for future preservation. On a more international scale, the World Heritage Program now recognizes sites of both natural and cultural significance. The impending Act must reflect the growing recognition of the interrelationship between Ontario's cultural history and natural environment.
>
> (McIlwraith Field Naturalists of London, Inc.)

3.9.2 PROVINCIAL AGENCIES

• Niagara Escarpment Commission

In a written brief to the Heritage Policy Review, the Niagara Escarpment Commission expressed support for the six Guiding Principles enunciated in the Discussion Paper. The Commission also urged province-wide adoption of the Niagara Escarpment Plan's Development Criteria for both cultural and natural heritage conservation.

Heritage

The objective is to maintain the heritage resources of the Niagara Escarpment Plan Area.

1. Care shall be taken to preserve known archaeological sites (especially native burial sites) or areas where such sites might reasonably be expected to exist.
2. Existing heritage features, areas and properties should be retained and reused. To determine whether such actions are feasible, consideration shall be given to both economic and social benefits and costs.
3. New development including reconstruction and alterations should be in harmony with the area's character and the existing heritage features and building(s) in general mass, height and setback and in the treatment of architectural details, especially on building facades.
4. Where new development involves a heritage feature it should express the feature in some way. This may include one or more of the following:
   a) preservation and display of fragments of the former buildings features and landscaping;
   b) marking the traces of former locations, shapes and circulation lines;
   c) displaying graphic verbal descriptions of the former use;
   d) reflection of the former architecture and use in the new development.
5. Where development will destroy or significantly alter cultural landscapes or heritage features, actions should be taken to salvage information on the features being lost. Such actions could include archaeological salvage excavation, and the recording of buildings or structures through measured drawings or photogrammetry.

The Commission expressed support for the decentralization of heritage conservation responsibilities, noting that existing municipally-based structures and mechanisms for conservation, enabled and supported by the province, are demonstrably the most successful in gaining support and achieving results. The Commission's recommendations in this regard are printed in full.

(1) Provincial legislation enabling heritage conservation powers for municipalities (in this instance The Ontario Heritage Act) should be strengthened to provide **greater regulatory support to municipalities** desiring same.

(2) At the same time the **Provincial interest** should be strengthened through specifying the means by which it will be determined (e.g. through degree of heritage significance), and how it will be exercised (e.g. review or appeal of municipal decisions).

(3) Municipal powers for heritage land-use regulation (e.g. designation by-laws) should be consistent in process and administration with those covered by **The Planning Act**, 1983; conversely, powers provided through **The Planning Act** should be employed where applicable to achieve heritage conservation objectives (e.g. Part III, "Official Plans" and Part V, "Land Use Controls and Related Administration").

(4) Both pieces of legislation should provide a range of **incentives** to encourage heritage conservation (e.g. "Bonus Provisions", s.36 of The Planning Act, 1983).

(5) The Heritage Act should enable or clarify municipal planning jurisdiction **beyond built heritage** to include property of archaeological and natural heritage significance (as well as architectural and historic significance).

(6) Similarly, the Act should provide for an extension of the mandate of LACAC's to that of a **Heritage Advisory Committee** with jurisdiction in the various other fields of heritage as well as architectural; alternatively, for municipalities desiring specialized advisory committees, the Act should provide for E.A.C.'s and others not presently covered. (A recent research report to the O.H.F. entitled **"Municipal Land Use Planning and Natural Heritage Protection in Ontario"** noted the effectiveness of EAC's, ESA inventories and other local planning measures in protecting natural heritage. The NHL Co-ordinating Committee has recommended that the OHF consider publication of these findings, particularly in light of its relevance and timeliness for the Heritage Policy Review.)

(7) The Act should enable these advisory committees to function or combine at the **upper-tier** as well as lower-tier level (similar to provisions in this regard for "Planning Advisory Committees" in The Planning Act, 1983).

(8) The Ministry should renew and enhance its **advisory programs** to facilitate, train and provide ongoing consultative support to these advisory committees, and implement **financial support and incentives** to municipalities on behalf of same.

(9) The Commission is prepared to co-operate with the Ministry, and other ministries/agencies with heritage-related responsibilities, to establish **demonstration pilot projects** for an enhanced advisory structure in support of municipal actions to conserve cultural and natural heritage.

In the area of natural heritage conservation, the Commission commended Ministry and OHF activity in the field, particularly with respect to their support for the Natural Heritage League, and such programs as the Carolinian Canada and Natural Heritage Challenge Funds, and the Heritage Protection and Land Stewardship Program. Specific recommendations included the following:

Recommendations:

(1) The above-noted programs and initiatives should continue to be accorded **full priority and support** by the Ministry and OHF.

(2) The Ministry should employ its liaison and co-ordination mechanisms with other ministries (e.g. Education) and agencies (particularly those having natural heritage-related mandates such as the Royal Botanical Gardens and Royal Ontario Museum), to carry out in various partnerships the full spectrum of Action Mechanisms (Section B.3 above) in support of natural heritage.

(3) Revisions to the **Ontario Heritage Act** should acknowledge and provide **mechanisms for conservation of natural heritage** as well as cultural heritage. This is particularly crucial for clarifying the application to natural heritage of mechanisms such as Provincial and municipal heritage easement agreements and municipal designation by-laws, as well as all new mechanisms to be considered for legislative authority.

(4) Conversely, those measures (primarily non-statutory) which have proven successful in the natural heritage field, such as the NHL and private land stewardship via landowner contact, should be adapted and applied to the conservation of cultural heritage.

(5) The Commission is prepared to continue full co-operation with the Ministry, OHF, NHL and others in support of natural heritage, including consideration of demonstration pilot projects such as that now underway for Escarpment Woodlots in Dufferin and Grey Counties.

- **Royal Botanical Gardens**

In its brief to the Heritage Policy Review, the Royal Botanical Gardens offered three observations:

- Heritage, environment and quality of life are closely linked concepts. While it is essential to list and ensure preservation of significant buildings and natural areas,... there is little point in doing so in isolation from surrounding areas, man-made or natural...;
- Designated heritage buildings and land must have real protection from demolition. Present demolition controls have no real teath. Property owners must be suitably encouraged and rewarded by worthwhile "carrots", but (as in the British experience) the "sticks" must be really painful;
- Education at all levels is obviously a key factor. Behind it lie the assumptions that make and mould our society...(One such assumption that) must be curbed is that all growth and economic development is necessarily good. Much is good only for the developer who benefits at the expense of the community at large and its heritage.

3.9.3 PROVINCIAL ASSOCIATIONS

- **Conservation Council of Ontario**

The Conservation Council of Ontario is a provincial association of major organizations committed to environmental conservation. In 1986, the Council, on contract to the provincial government, published its assessment of conservation and development in the province: "Towards a Conservation Strategy for Ontario".

The Council has placed a strong emphasis on the need for, and development of, a conservation strategy -- "the process whereby the resources which are available throughout the province, in all sectors, are brought to bear on a common set of conservation objectives". In their submission to the Heritage Policy Review, the Council focused on the role of the Ontario Heritage Foundation both in developing the wildlife and natural areas component of the strategy, and within the overall conservation movement in Ontario.

One of the foremost recommendations made in the Council's 1986 report concerned the need to strengthen horizontal, or cross-sectoral planning for conservation. Accordingly, the Council recommended to the Heritage Policy Review that the OHF work to improve the integration of natural heritage protection into the programs and policies of other ministries and government agencies where relevant.

A second recommendation called for the OHF and the Conservation Council to coordinate their activities in natural area conservation. Specifically, it was suggested that the chairpersons of the Natural Heritage League and the Council's Wildlife and Natural Areas Task Force should seek to coordinate their programs, and consider a more formal relationship or merger in the future.

Finally, the Council recommended that the OHF become an active participant in the development of an Ontario Conservation Strategy.

> ...The Discussion Paper is correct in identifying the need to incorporate natural heritage conservation into the policies of other ministries. We feel that this should be done within the context of a complete conservation strategy which would establish the framework for addressing all aspects of the interaction between humans and the natural environment in a similar fashion (in particular, waste management, agriculture, energy use and forestry).

- **Federation of Ontario Naturalists (FON)**

The Federation of Ontario Naturalists represents 20,000 naturalists in 69 federated clubs across Ontario. In a submission to the Heritage Policy Review, the FON expressed support for undertakings, whether private or public, that encourage stewardship, sustainable development and protection or enhancement of Ontario's natural heritage.

In the view of the FON, one of the major obstacles for natural heritage conservation is the lack of clearly defined roles and jurisdictional boundaries between government ministries.

> ...More precisely, without more clearly defined roles (in operative terms) than which exist today, there is a very real chance of heritage related issues or items falling into "jurisdictional cracks". The existence of jurisdictional cracks promotes judgement calls, a situation which can often strain the bounds of political realities.
>
> The FON would emphasize the desirability of mapping the jurisdictional jungles which exist along the edge of various Ministry mandates. It would seem of particular importance as the Ontario Heritage Fund gains momentum on the natural heritage front (moving further away from the Ministry of Citizenship and Culture traditional field of built and cultural heritage) that these boundaries be made clear. This is by no means a suggestion they be entrenched or irrevocable. In fact, flexibility is a positive attribute in this instance. But the limits that each Ministry is willing to extend its own influence should be common knowledge. This is particularly important when dealing with new initiatives such as untaxing nature, land owner contact, and the encouragement of enhanced private stewardship, etc.

FON was optimistic that a clearer working definition of heritage conservation would result in increased cooperation, and recognition by more branches of government of "the importance of playing greater heed to protecting all natural heritage values". In particular, it was felt that:

- MCC should take a more visible role in the implications of acid rain for natural as well as built heritage;
- MNR should strengthen programs such as Areas of Natural Scientific Interest (ANSI) and the non-game program, and give greater emphasis generally to non-consumptive programs;
- The relation of "heritage" (as defined under the OHA and Planning Act) to the planning activities under MNR's Class Environmental Assessment on Timber Management on Crown Land in Ontario should be clarified; and
- Explicit policy statements on such issues as wetlands protection, threatened and endangered species, and forestry would provide reassurance to public expectations of government commitment to natural heritage protection.

A second major area of interest for the FON was in exploring ways to take a more proactive role in public education and awareness.

> The FON has already entered into stewardship agreements with the Ontario Heritage Foundation and looks forward to a mutually beneficial relationship. The FON's expertise and experience in managing its own extensive private system of nature reserves is now available to the OHF through this mechanism. A challenge to be faced and accepted by organizations like the FON is how will they take a proactive role in education to complement government initiatives? This has been accomplished through the FON education program, with its classroom outreach, and a successful series of education kits and videos, (Acid Deposition, Wetlands, Wildlife in Jeopardy, etc). What will be needed is more one to one delivery of the naturalist/heritage protection message delivered to adults like the FON volunteers bird

> guides at the Presqu'ile Provincial Park, spring waterfowl weekend. This program has the potential to deliver a message to the 5,000-6,000 visitors which are in the park on these two weekends.

FON felt it was critical that some form of outreach be initiated to incorporate the interests, values and leisure activites of Ontarians, including newcomers and "intramigrants" from within Canada. Certain programs offered by FON address the special needs and interests of an increasing family-based membership, and those of older members. It was also noted that:

> While not necessarily demographic there are changes occurring in how the Ontario populace involve our natural heritage.... (For example,) according to a Canadian Wildlife Service (CWS) report in 1983, sports hunters now comprise only 7% of the adult population in Ontario. Dr. Jim Butler's report entitled the Birdwatchers of Point Pelee (1987 University of Alberta) begins with the statement "Birdwatching is probably the fastest growing wildlife (natural heritage) recreation activity in North America". It is an awareness of trends such as this often originating in the U.S.A. which will be crucial to successfully delivering heritage awareness strategies and relevant responses.

Recognition of such trends in public attitudes toward the preservation and enjoyment of natural heritage will have implications for both tourism and economic development strategies. FON noted that the view of tourism must be widened to incorporate a greater appreciation of the role and potential of nature-oriented, non-consumptive activities. Moreover, the economic spin-offs of these leisure choices are considerable.

> While reading the section on "economic development" (p.15) I was surprised to see no mention of the previously noted C.W.S. report on the Value of Wildlife to Canadians (1983). As individuals become more familiar with the conclusion incorporated in this document, the economic arguments in favour of heritage protection will be

> increasingly easy to make... (for example,) Butler (1987) calculated that birdwatchers may account for a full 25% of the annual revenue of businesses adjacent to the Point Pelee National Park area, and that photograph related expenditures (film and processing) in Leamington during the month of May are approximately $710,000 (or approximately 1.7 million photos.)...

- **Natural Heritage League**

The National Heritage League is a partnership of twenty-eight conservation organizations, both government and non-government, who share an interest in the protection of natural areas in Ontario. The League's comments to the Heritage Policy Review can be summarized under seven points.

1) **The Ontario Heritage Foundation and the Ministry of Culture and Communications should continue to strengthen the ties between natural and cultural heritage.**

The League observed a growing recognition among Ontarians that the natural environment is an integral part of our common heritage and should be appreciated and husbanded rather than exploited. The increasing involvement of the Ontario Heritage Foundation in natural heritage matters was also welcomed, and the League called for further initiatives, including the allocation of significant financial and human resources to activities in the natural heritage area.

2) **The OHF and MCC should extend proven mechanisms where appropriate and strengthen the Ontario Heritage Act to address natural heritage concerns.**

Noting that many of the more effective provisions of the Ontario Heritage Act (e.g. Minister's power to designate, advisory role of LACACs) are not applied to natural heritage areas, the League called for more formal legal recognition and protection for natural heritage resources.

> One of the most important of those mechanisms is the LACAC, which has stimulated such a high degree of municipal involvement in heritage conservation. In a few regions, notably Waterloo, Halton, and Niagara, municipal governments have at their own initiative set up Environmental Advisory Committee to assist in efforts to protect natural areas through the Planning Act. However, this innovation is hampered by a lack of a clear provincial mandate, and appears unlikely to spread quickly. Several existing LACACs have expressed interest in expanding their role to include natural heritage, and this may be the most effective way to incorporate those objectives. As an alternative, legislative amendments to establish Local Natural Heritage Advisory Committees could be brought forward.

3) **The OHF and MCC should focus on cooperative mechanisms with other government and non-government agencies to reach common goals.**

In a field as complex as heritage protection, measures to undertake "regular, meaningful contact" and joint planning among concerned agencies were suggested as crucial. The League itself was described as a good model of the kinds of benefits that such cooperation can achieve; for example: joint definition of priorities for action; development of alternatives to public acquisition; cooperative arrangements for property acquisition and management; and joint sponsorship of educational and research activities.

In the view of NHL, the success of the League over the last five years suggests several future directions for the OHF and MCC.

> ...First the financial and organizational support provided to the League should be continued. Second, similar cooperative organizations should be considered for other sectors of the heritage field where they could be of benefit. Third, the Foundation should continue to build upon its excellent record of cooperative action with other agencies, through such mechanisms as custodianship agreements for property management.

4) **MCC should integrate heritage concerns with the activities of other provincial agencies.**

Integration is needed to reduce conflicts or misunderstandings in two areas: first in the relationship between the objectives of the Ontario Heritage Act and the mechanisms of the Planning Act, which governs most development in the province; and second, in the natural heritage area, where close, ongoing cooperation with the Ministry of Natural Resources is essential.

> ...Through the Parks and Recreational Areas and Wildlife programs of MNR, and the associated ANSI program, a major component of natural heritage protection is already being addressed. The activities of MCC and OHF in this field should complement and enhance these existing programs in an integrated way. One way this could be achieved, for example, would be for the MCC/OHF programs to be targetted particularly towards private land, where there is a clear need for additional activity.

5) **The OHF should continue to develop programs that emphasize its role as an innovator and catalyst.**

The League encouraged continued OHF involvement in such initiatives as natural heritage easements, landowner contact programs, innovative funding arrangements for securing land, revolving loans for natural area acquisition, and other related programs.

6) **The need for a provincial trust organization similar to Britain's National Trust should be examined.**

Noting that no single agency in Ontario combines all the characteristics of the British or Australian National Trusts (e.g. are non-governmental, have broad public membership, acquire and hold property and raise funds through marketing of properties and products), the League felt that a Trust, or series of Trusts, might provide a significant vehicle for increased participation by landowners and individuals in protection efforts. Whether the OHF or a new agency could take on such a role should be explored.

7) Increased funding for heritage programs will yield significant economic and social benefits.

The League noted that programs such as the Bicentennial Challenge Fund have been especially successful in stimulating private donations, and encouraged cooperative partnerships with private landowners in future funding programs. It was also considered critical to ensure a sufficient and sustained funding commitment on the part of government.

> Even the most cursory overview of natural heritage programs in Ontario reveals that a great deal remains to be done, and that a number of worthwhile programs have the potential to produce long-lasting results. The critical ingredient, of course, is sufficient and sustained funding, an ingredient that must be shared with other worthwhile heritage programs. We would argue that investment in heritage programs makes sound economic sense not only because of the related job creation and tourism benefits, but ultimately because a healthy environment is a prerequisite to a healthy economy.

3.10 NON-PHYSICAL HERITAGE

A very vocal and enthusiastic response was generated by a variety of associations representing specific ethnic groups, as well as museums, centres and associations for folk arts and folklore. (One submission from the Centre franco-ontarien de folklore was accompanied by over twenty individual letters of support from members and affiliated organizations, as well as a petition of support for the Heritage Policy Review signed by seventy-eight Sudbury franco-Ontarians.)

If a single theme ran throughout the submissions, it was encouragement for an expanded definition of heritage that would include the "intangible" or non-physical components of culture -- our behaviours, traditions and values -- on equal terms with our built environment, material culture, and natural resources.

As with many non-profit, volunteer-based organizations and associations in the heritage sector, an appeal was heard for improved access to funding, facilities and technical resources to support initiatives that are considered to have far-reaching benefits for heritage awareness and preservation.

3.10.1 DISCUSSION PAPER ISSUES

i) Extend Boundaries of the Heritage Movement

It was considered critical to find ways, both formal and informal, to expand our understanding of cultural heritage. Many submissions strongly urged the Ministry to develop a policy and revised Heritage Act which would allow for the preservation, study, interpretation and celebration of Ontario's living arts and traditions, as well as those heritage resources brought from past times and different places.

From the perspective of ethnocultural communities, and associations of visible and non-visible minorities, the notion of heritage is a broadly defined amalgam of living arts and emerging traditions.

> As a relatively new community of transplanted people who have proudly chosen to be Ontarians, we in this area do not have buildings, properties, collections that constitute a museum or some thing that is of immediate historical or national value, which can exert the influence of our heritage;
>
> ...Like all other immigrants of the past from many parts of the world, we also have brought with us, a cultural heritage, its traditions, languages, religious fervour, the beauty of performing arts, rich and spicy culinary arts and habits, fashions and styles in the garment industry and many many such other values that are too many to mention; all of which have in some varying degrees have become part of the life of this society;
>
> (India-Canada Association)

Community and cultural centres and facilities for performances were often cited as the most urgent needs facing this sector, together with ongoing funding support and measures to enhance the ability to raise private funds. The latter concerns involved removing the "cloud of a constant threat" by the Ministry of Consumer and Commercial Relations to withdraw license privileges related to fundraising bingos, as well as promoting further tax exemptions for corporations that provide support and funding to heritage and cultural activities, especially in smaller communities.

ii) Current Division of Responsibilities

In the view of one writer, the current provincial roles of "advisor and financial supporter" seem to be the most appropriate in any reconsideration of a division of responsibilities for heritage conservation; however, the same writer was cautious about expanding the role of municipal governments any further.

> Local municipal governments can also be too narrowly focused to form good heritage resource conservation policy. Short-term political gain, development and construction expediencies, reduced tax base and increased expenses in the "hard services," make it difficult for a local municipal council to take the long-term view of heritage and culture (two concepts only vaguely understood at best). Whatever the policy and decision-making powers eventually granted to the municipal government should come only with the parallel establishment of a review and appeal process to the provincial government level. The Ontario Municipal Board might serve as a model for the establishment of an Ontario Heritage Review Board.
>
> I don't mean by this that the provincial government should take upon itself all responsibility for determining the relative value of heritage activities and projects, nor should it become the arbiter of a community's local priorities. This responsibility should stay with the local people--not necessarily with the local government.
>
> If the new heritage policy supports and encourages face-to-face activities and interaction, on the local and neighbourhood level, empowering the community to establish its own priorities will be an automatic result
>
> (Mac Swackhammer, Welland)

Greater flexibility was urged on the part of granting agencies in responding to local needs for support.

> We must attempt to create a policy which will loosen some of the definitions of heritage service institutions to better meet the self-defined heritage needs of the institution users. Open-ended definitions of "resource centres," for example many help a community group discover alternatives for expressing their heritage and culture, rather than force them to change purpose or activities in order to meet criteria established for ministry financing.
>
> A policy which encourages community groups to be the authors of their own preservation programmes, developers of their own expressions of heritage, must not be used as the excuse to reduce support or financing in those areas where public interest and self-starting is weak. The policy must facilitate local development and respect local priorities, but provide direction and encouragement, in some cases enlightenment, for the local community. Publicity and popular education undertaken through special interest groups and existing heritage institutions would be a means to increase public commitment to heritage resource conservation.
>
> (Mac Swackhammer, Welland)

Finally, a number of submissions urged the Ministry to create the position of Provincial Folklorist, to assist governments, agencies and organizations in the identification and development of programs, and to coordinate the various existing services concerned with the preservation of folklore and folklife in the province.

iii) Increase Public Awareness

Support was expressed for increasing access to, and awareness of, the living and traditional arts by developing or promoting multi-media libraries of various ethnocultural folk arts and traditions. Audio and video recordings of dance, music, song, dialects and languages, stories and other undocumented materials provide invaluable tools for teaching, research, and learning.

The Provincial Archives was also urged to establish an active acquisition policy to ensure more archival material relating to ethnocultural organizations, their clubs, churches, and newspapers are properly preserved and made publicly accessible.

An emphasis on popular and formal education at all levels was evident in many of the submissions.

> Our heritage policy should encourage the expansion of the heritage components in elementary and secondary school, beyond the history and social studies curriculum. Heritage must not remain taught as the remnants of another century, country or generation, but come to be seen as the present everyday experience of all our people.
>
> Careers in heritage fields should find room in the secondary school curriculum. Career counselling in gallery, museum, arts administration fields is weak, but more importantly the students have little opportunity to meet workers in heritage resource conservation fields.
>
> The education component of our new Heritage Policy should also consider the importance of popular education. Demands on public sector support budgets would be considerably reduced if community members could be taught the conservation and interpretation of heritage resources. We must protect things for the future, but protection, like charity, should begin at home.
>
> (Mac Swackhammer, Welland)

iv) Strengthen Professional Training

It was considered important to develop more opportunities for training in the heritage professions. A heritage internship program in the living and traditional arts was suggested, modelled on the North Dakota Council of the Arts Traditional Arts Apprenticeship Program.

v) Heritage Conservation and Tourism

In the view of one writer, Ontario's diverse ethnic heritage holds great tourism potential, but the image depicted of our people and culture abroad needs much more thought and imagination. (Criticism was levelled, for example, at a Canadian exhibit at the Epcot Centre where exhibit guides were dressed as lumberjacks).

At the same time, concern was expressed that tourism promotion and marketing must not exploit or undervalue heritage conservation efforts and accomplishments.

> Heritage resources and the tourist industry are inextricably intertwined, yet there are some unsolvable conflicts. Many make the argument that the marketing of our traditional heritage as a tourist attraction immediately changes (some say destroys) the very heritage we value. Certainly too often as a marketing device, a few components of the cultural complex become abstracted and symbolized to stand for the whole, and so the tradition is truncated and devalued--known only in its packaged form. When developing policy and supporting those projects which combine aspects of heritage conservation and tourism, the primary emphasis of the projects and policies must continue to be heritage resource conservation.
>
> (Mac Swackhammer, Welland)

3.10.2 PROVINCIAL ASSOCIATIONS

- **Multicultural History Society of Ontario (MHSO)**

MHSO noted that heritage has intangible as well as tangible aspects, and that Ontario is and will be increasingly a multiracial, multilingual and multicultural society. The Society therefore expressed support for efforts to acknowledge and preserve the diverse and rich heritage of Ontario's people.

- **Ontario Black History Society**

Noting that in the past, heritage policies, programs and funding have been directed primarily to mainstream organizations, the Ontario Black History Society urged the Ministry to give greater prominence to the heritage of ethnocultural communities. Such an effort should involve an examination of the accomplishments, current activities and future plans of ethnocultural groups working in this area, and the development of funding programs to encourage research, publication and heritage preservation within ethnocultural communities.

As a provincial heritage organization, the Society was also greatly concerned at the inadequacy of funding under the Ministry internship programs. These programs, it was felt, desperately need to reflect current wages and the cost of living, as well as the skills of individuals entering the heritage preservation field, if heritage organizations are to attract the kind of qualified staff that are needed.

A final area of concern was the "ghettoization" of Ontario's heritage. The Ministry was urged to take a leadership role and to work more closely with the Ministries of Education, and Tourism and Recreation to ensure that educational publications and tourism promotion accurately and imaginatively portray the province's multicultural heritage. MTR's Travellers Encyclopedia, the Expo '86 Ontario pavilion, and various audio-visual presentations used in promoting Ontario abroad were particularly criticized for ignoring Ontario's "many shades and cultures".

- **Ontario Folk Dance Association (OFDA)**

The Ontario Folk Dance Association has as its main objective the promotion of ethnic folk arts, with a particular emphasis on folk dance as an expression of the history and culture of various ethnic communities.

A major theme running through the OFDA submission was the need for resources to enable the Association to reach a larger public than is currently possible, to preserve and make available collections of dance notes, folk music, costumes, books and related materials using new computer technologies as well as to establish a permanent base for the organization, among other things.

> Resources are, essentially, a form of recognition and acknowledgement of the importance of heritage activities...without sufficient resources, it is difficult for non-profit groups such as OFDA to have a wider impact. Yet, we feel that it is within the non-profit sector that the experience, energies and focus lies and should continue to lie. Accordingly, with assistance of a financial nature, OFDA could expand its existing programs and create new ones, while at the same time enabling the government to participate in the promotion and preservation of Ontario's cultural heritage and traditions in a meaningful way.

The OFDA also commented that measures are needed to strengthen professional training and educational opportunities in the study of folk dance.

> We feel that there are currently very few recognized degree courses in ethnomusicology and dance ethnography. Nor are there research grants available to finance study of the original material in the countries where the traditions and dances come from. These disciplines need to be recognized by educators and the public alike in order to upgrade the training of teachers and ensure the inclusion of heritage classes within the schools. It should be noted that in exploring folk dance, one must also delve into such areas as culture, history, geography and anthropology; as such, this is truly a cross disciplinary area of study which deserves more exposure and recognition.

- **Ontario Folklife Centre**

The Ontario Folklife Centre has as its objectives to preserve and present Ontario folklife in all its aspects by collecting and documenting folklore and folklife, facilitating and disseminating research, making recommendations to government and providing public education and information, and developing the Ontario Folklore-Folklife Archive.

In its submission to the Heritage Policy Review, the Centre noted a tendency in much of the English speaking world to identify heritage with tangible objects and property that have always been the personal possessions of a small segment of the population. What has been ignored, or discounted, is the "culture of the common people".

> ...There is, and long has been, a culture in this country that makes us different from other people; we have a set of values that makes our actions, our laws, our lifestyle distinctive; we have a particular way of talking, of eating, of celebrating and so on. This Canadian way--our culture--deserves fuller appreciation, especially when we are attempting to "give our past a future".

The Centre felt it was necessary to define heritage to include "the intangible as well as the tangible, the common as well as elite, the average as well as special, the typical as well as the extraordinary", and to undertake a concerted program of education, popularization and participation.

> ...In these regards, folklore and those who study it should receive particular attention. Folklore is those artifacts, be they oral, material, or behavioural, that exist in the oral tradition amongst a group of people who identify with and through them and consider them traditional. It is, then, the culture of the common people; it is what people themselves consider important enough to remember and pass on orally or through observation and imitation. This is the "grassroots" of our culture and, however much we may wish it other (better, more, whatever), this is what it is in operation. We must understand this culture if we are ever to know ourselves and, thereby, to make informed decisions for our future with a confidence based on appreciation of our present as well as past. According to folk wisdom, "Before you know who you are or where you are going, you must know whence you came."

Finally, the Centre urged the Ministry to consult with professionally trained folklorists over the course of the Policy Review, and to create the position of Provincial Folklorist--the first in Canada--to coordinate the various public activities accociated with the preservation and enhancement of folklore and folklife in Ontario.

3.10.3 NATIONAL ASSOCIATIONS

- **Folklore Studies Association of Canada (FSAC)**

While encouraged that the Heritage Policy Review has taken into account both tangible and intangible components of heritage, the FSAC considered it imperative that the interests of folk arts and traditional artists be recognized, and that their visibility be increased.

On a formal basis, it was recommended that the specific categories of folklore and folklife be added to the list of cultural components defined in the Ontario Heritage Act as significant to Ontario's heritage, and worthy of protection, support and financing. To quote the resolutions adopted by the Association:

> 1) Folk arts are arts. They are just as important as legitimate as any other art form and deserve the same status and support.
>
> 2) Folk arts, like all other art forms, operate in accordance with their own standards and have a distinctive and separate set of structures, functions, values and needs.
>
> 3) Agencies and institutions in the public and private sectors will most effectively and equitably support cultural endeavours by making appropriate accommodations for folk arts in both their eligibility criteria and in their granting procedures.

3.11 OTHER PROVINCIAL/NATIONAL ASSOCIATIONS

Submissions to the Heritage Policy Review were received from five associations representing various interests in the conservation of structural and landscape architecture, monuments and sites, and historic and artistic works. Their responses are outlined separately below.

- **Architectural Conservancy of Ontario (ACO)**

Both the Ontario Council and the Brant County Branch of the Architectural Conservancy of Ontario made representation to the Heritage Policy Review.

Since 1933 the Conservancy has been attempting to preserve buildings and places of natural beauty which constitute part of Ontario's heritage. Noting that a great deal of work has been done, the Conservancy felt nevertheless that "the visible record of our architectural and natural history continues to be steadily eroded away by demolition, neglect, ignorance and economic pressure."

The Heritage Act, it was felt, has had little effect in arresting this attrition or in protecting threatened buildings. Radical changes are therefore required.

> Briefly we see the current legislation as being weak and misdirected: designation has become merely a cataloguing tool to process grant applications, and actually provides no real protection to the buildings; the inconsequential is given equal prominence with the significant; there is no absolute protection for monuments of the first order; monuments are seen as stage sets to be renovated, traded, moved and disposed of as required by the local municipal politicians and as dictated by the winds of current fashion.
>
> (Ontario Council)

This feeling was echoed in the Brant County Branch submission, which stated that as "long as the main thrust for heritage remains at the municipal level, we feel no major improvements in the system will be effective."

Fundamental changes to the division of responsibilities, and to the system of inducements or incentives for heritage conservation were called for. Specifically:

> - Current divisions of responsibilities seem poor to us. Too many cooks spoil the broth. One body should be responsible for preservation...not municipal...perhaps a body apart from all governments.... Municipalities could recommend buildings and areas to be preserved but should not be in charge of demolition or feel only those buildings they have chosen should be preserved.... Perhaps some kind of penalty to municipalities which ignore older buildings would be efficient;
> - Brantford is an example where grants were given to redevelop the core (we think in an undesirable manner) and grants were also given to a group promoting restoration...government money and taxpayer money going to opposing projects, neither one of which has been successful. Surely a clearing house...again one body... is needed;
> - Tax inducements could be studied ... some form of compensation in lieu of demolition could well be a deterrent; and
> - Communication and cooperation are also needed...newsletters, circulation of notice of projects and ideas, a central registry cutting across all existing heritage groups...and a co-ordinator to inform all listed as to what is happening...especially demolitions.
>
> (ACO Brant)

- **Ontario Association of Landscape Architects (OALA)**

The Ontario Association of Landscape Architects represents 581 landscape architects in Ontario, and is concerned with the preservation of cultural landscape resources such as gardens, parks, and the grounds and districts associated with heritage buildings.

OALA pointed out that Ontario's cultural landscape heritage includes sites which have both associative and design-based heritage value.

> For example, many parks have associative heritage value because of the events that have occurred within these sites, and cemeteries have associative value because of their relationship to early settlement hist[illegible] of a particular locale. Examples of landscapes which have heritage value because of their design-based qualities include gardens (both public and private), parks, parkways, and landscape features such as fountains, statutes, and gateways which may be significant because of the design style they represent, or the fact that the design was executed by an historically significant designer.

OALA's major concern was that the Ontario Heritage Act appears to be too restrictive in its interpretation of cultural heritage.

> In reviewing the existing Ontario Heritage Act, we find the Act very narrow in its view of what constitutes our cultural heritage. Primarily, the current Act directs attention only to buildings, to collections of buildings in districts, and to archaeological sites. The OALA believes that the Act should be expanded to extend protection to other aspects of cultural heritage, and more specifically to protect our man-made landscape heritage.
>
> From the viewpoint of the OALA, we urge the Ministry of Citizenship and Culture to consider expanding the wording of the Act to include cultural landscape resources in their review process.

- **Canadian Institute of Public Real Estate Companies (CIPREC)**

CIPREC represents forty major real estate investment and development companies which are involved in all aspects of residential, commercial and industrial real estate activity. CIPREC's general members are real estate development companies whose shares are publicly traded. Associate and affiliate members include real estate subsidiaries of public companies, large privately owned development companies, as well as trust companies and life insurance firms with substantial involvement in real estate development and investment.

CIPREC members are committed to the goal of heritage building preservation within the context of the following:

- an equitable professional process in which the proposed designation of the building is subject to rigorous analysis against clearly defined criteria in a meaningful review process; and
- fair compensation to owners of historic buildings, which recognizes the costs incurred in retaining and restoring historic buildings; as well as the economic impact, if any, of the development of the site to retain the heritage building compared with development on a clear site.

It was CIPREC's opinion that present mechanisms for heritage preservation contain certain inadequacies; some procedural, others financial and political. Despite its shortcomings, however, the existing process has had considerable success in those cases where negotiations between developers and municipal representatives have been cooperative, constructive and creative.

> The experience of CIPREC members has been the preservation of heritage buildings requires complex, lengthy negotiations with municipal authorities that are most successful when conducted in a cooperative environment. It was with some sense of gratification that we noted the emphasis

> in the Province's Heritage Discussion Paper on the need for cooperative attitudes in the negotiating process. It must be stressed that it is a negotiation. The landlord/owner is giving up or foregoing certain ownership rights on a particular property to achieve preservation, a public benefit. In return, to offset the economic cost or loss of future revenues, the owner endeavours to obtain compensation. The compensation can be provided in a variety of ways but most commonly are either increased density rights on the heritage site or are density transfers to another site. All of this economic negotiation being carried on in parallel with the site planning, new building design and while heritage preservation concepts and costing are being negotiated. It is obvious and extremely important that the parties to the negotiation, usually a municipal government, and its agents such as an historical board, and the developer/owner have balanced strength at the bargaining table.

At the same time, CIPREC felt that the process of designation is becoming "less fair, less constructive and more confrontational." In particular, CIPREC was critical of initiatives undertaken in the City of Toronto to list historical properties and to extend municipal control over demolition of designated properties through such legislative proposals as Bill 57. CIPREC's major concerns can be summarized as follows:

- The criteria for listing or designating an historic building do not differentiate between buildings in terms of their relative historic value. There is no indication as to which are the most significant and worthy of preservation, for example in Metro Toronto there is no classification or prioritization of the more than 2,500 buildings listed. The listing and designation processes are therefore considered to be somewhat arbitrary and there is a lack of industry confidence in their validity for the purpose of realistically defining buildings which must be preserved;

- Although there are opportunities for representation at the public hearings held before the historical boards and at the neighbourhood committee meetings, there is no right of appeal to an impartial tribunal, such as the Ontario Municipal Board, from a decision of Council to list, designate or refuse alteration to an historic building. The implications of designation may be more of a financial burden than a zoning change which is always appealable... (Appeal from Council's intention to designate a building is only provided at the Conservation Review Board. The recommendations of this Board are not binding on Council, limiting the effectiveness of this avenue of appeal);

- No provisions are included to ensure fair compensation to owners for the preservation of historic buildings.... In the City of Toronto although the heritage preservation policies contained in Section 1A.42 of the Official Plan have resulted in the preservation of a number of buildings the incentives appear to be inadequate in areas where development pressure is intense, and the City's own report on this matter draws the same conclusion;

- The issue of interim and long term demolition control of historic buildings is a critical one in the overall question of heritage preservation and should be thoroughly evaluated within the context of ongoing reviews of heritage policies at the municipal and provincial levels. In light of these ongoing studies, Bill 57 is premature.

CIPREC was also concerned that both the degree of representation of community interests on local architectural conservation committees, and the level of resources available to these committees are inadequate to fulfill the mandate for heritage building preservation outlined in the Ontario Heritage Act.

In conclusion, CIPREC recommended that:

- an inventory of designated heritage buildings for major urban centres, and other significant heritage locations be prepared, and that the inventory be classified in such a way as to distinguish between buildings in terms of their relative historic or architectural value;

- the criteria used for listing and designation of properties be clearly defined; and that the process of analysis be more rigorous and open to both public scrutiny and appeal;
- appropriate and economically realistic incentives be available to the developer from some level or combination of governments, to offset the increased economic cost of preservation. These should include increased density rights and transfers, but must also include the possibility of reduced taxes at all three levels of government to provide the flexibility to accommodate situations where adequate economic offsets cannot be generated by the traditional density related methods;
- the role and representation of historical boards and other heritage agencies be examined to ensure that all facets of interest are represented, including owners and developers, and that the role of the Board is matched by appropriate staff and board member skills and experience; and
- the Ontario Heritage Act should be replaced with a more rigorous and fair piece of legislation which would respond more realistically to the needs of the development industry and the public.

A final observation related to the question of increasing public awareness of heritage conservation.

> Public awareness of heritage matters appears relatively high, particularly for buildings of architectural or historic significance. Also, the present provincial review, public meetings and eventual public dialogue will do much to heighten public awareness. Perhaps there is a need for more public involvement in the various community and local organizations and public use of heritage building facilities.

- **International Institute for Conservation of Historic and Artistic Works -- Canadian Group (IIC-CG).**

The IIC-CG is a charitable, non-profit scientific/educational organization, whose principle activity is the promotion of activities relating to the conservation of artistic and historic works.

IIC-CG felt that a clearer understanding of "conservation" as the actual, physical treatment of cultural property was needed. The Institute noted that conservation can be carried out using many different methods, and that the extent of conservation treatments can vary greatly.

> For example, in the case of a historic building, is the object of heritage conservation to preserve the facade of the building in order to create a certain "ambience" in an area, or to also retain as much of the architectural interior detail as possible, in order to have a surviving record or building techniques and fashion at the time that the building was constructed? Who should decide the extent to which heritage conservation should be taken? If it is left to purely economic considerations, then the least expensive and easiest route will be taken in most cases, which may result in the loss of much valuable information. Perhaps this is one possible role that the provincial government could have, to ensure a balance between various conservation philosophies.

The question of balancing competing interests in heritage conservation is also fundamental to the philosophy of the IIC. The first in the "Code of Ethics and Guidance for Practice for Those Involved in the Conservation of Cultural Property in Canada" states:

> It is the responsibility of the conservator, acting alone or with others, to strive constantly to maintain a balance between the need of society to use a cultural property, and the preservation of that cultural property.

Concluding that the desire to "preserve everything perfectly" must be tempered by economic realities and societal demands, IIC-CG urged the Heritage Policy Review to strive toward the same balance.

The Institute also addressed the question of roles and responsibilities for heritage conservation. It was felt that "heritage conservation must have its roots in the community to be effective on a wide scale." The role of municipal and provincial governments should then be one of support, guidance and information. Local community organizations, in particular, need assistance in the areas of:

- accessing legal and technical expertise, advice, literature and training;
- marketing heritage conservation to local politicians and others with convincing data and arguments on the benefits for their communities; and
- tapping local museum and archival resources to raise public awareness through more interesting and relevant programs and displays.

Finally, the IIC-CG pointed out that local community groups will also need increased resources for conservation work, including labs, conservators, and conservation architects. A possible role for the province, the IIC-CG suggested, could involve the development and operation of a "resource centre" for use by various local groups in order to ensure that the conservation of heritage is carried out in the best possible manner. The development of the Canadian Conservation Institute offered a useful model.

> ...In the early 1970s, when the Canadian Conservation Institute (CCI) was formed, it was envisioned by some that CCI would perform all of the conservation for all of the museums in Canada. This proved to be not only impossible in terms of resources, but also not desireable, as it is preferable that the museum takes full responsibiltiy for the care of its own objects. In the ensuing 15 years, CCI has developed into a resource centre to assist the conservators and curators in Canadian museums, and only in this way has it been able to be of service to museums on a national scale.

. **International Council on Monuments and Sites (ICOMOS)**

The International Secretariat of ICOMOS responded to the Discussion Paper by making two brief observations.

First, ICOMOS stressed that public awareness of heritage can be raised most effectively through information and direct contact.

> There is a UNESCO "International Day for Monuments and Sites" and the National Committees of ICOMOS take the initiative in organizing it. ...Perhaps resort to an "Ontario Heritage Day" (if this does not already exist), would be of some utility, giving rise to local presentation of heritage, free admission to monuments and museums, tours for school children and other groups, coverage in local and provincial media, etc. However true it is that we live in an "age of information", direct contact with heritage is absolutely essential, and this sort of event is both information and contact.

Second, ICOMOS felt that the cooperation of other Ministries and agencies, and particularly schools (hence the Ministry of Education and local school boards) will be essential to the achievement of "social integration" as a goal for a Heritage Policy.

APPENDIX A

Executive Summary

Discussion Paper
Heritage: Giving our Past a Future

EXECUTIVE SUMMARY/FRAMEWORK FOR DISCUSSION

The release of this discussion document represents the first step in the Government of Ontario's commitment to the establishment of a comprehensive policy framework within which to plan, implement and evaluate its commitment to heritage conservation in the province.

The paper is structured as follows:

The Context argues for a broadened definition of the nature and importance of heritage resources and for their integration into broader questions of social and economic life. A number of major social and economic trends transforming Ontario are examined and their impact on heritage conservation concerns assessed.

Emerging Challenges examines the changing needs of the heritage conservation movement as we move towards the next century. These include the need to rationalize the roles and responsibilities of the various heritage "players", the need for new coordinating mechanisms, the need for more widespread public awareness and understanding of heritage concerns, professional training and education needs in the heritage field and, finally, the challenge of moving heritage conservation efforts into the mainstream of Ontario life.

Issues and Themes examines heritage conservation as it relates to such questions as the general process of social change, economic development and property interests, tourism, and the development of the shared values and common understanding necessary to social cohesion.

In order to provide readers with a framework within which to review this document as well as a point of departure for discussion at the upcoming public meetings the following questions and guiding principles have been identified. This identification of issues should *not* be considered exhaustive, merely a point of departure for discussion and public input.

Key Questions Emerging from the Discussion Paper

1. To what extent, and in what respects, should **municipalities** have a central role to play in heritage conservation?
2. Is the current **division of responsibilities** for conserving **heritage properties** the most effective and desireable?
3. What steps could be taken to **reconcile conflicting interests** in the conservation of **heritage properties** in Ontario?
4. How can the resources and efforts of the **private sector**—both for-profit and not-for-profit—be effectively used in furthering heritage conservation in Ontario?
5. What steps could be taken to increase **communications and cooperation** among the various public and private-sector players currently active in heritage conservation in Ontario?
6. By what means could **greater public awareness** of heritage be achieved at both the community and provincial levels?
7. How can heritage conservation serve as a greater stimulant to **tourism** in Ontario?
8. What measure could be taken to strengthen **professional training and educational opportunities** in various heritage disciplines—archaeology, architectural preservation, documentary history, museum studies, and so forth?
9. How can we manage the new **information technologies** to assist in heritage conservation in Ontario?
10. What steps can be taken to **extend the boundaries** of the heritage movement to include groups and individuals not previously involved?
11. Are there **gaps and inconsistencies** in our approach to heritage conservation in Ontario and, if so, how can they be addressed?
12. What steps could be taken to **integrate heritage resources and activities** with community interest in such spheres as health, education, the environment, the economy and so forth?
13. In reviewing the principles set out in the 1972 **World Heritage Convention** (Appendix D), what implications arise for future heritage conservation efforts in Ontario?

Guiding Principles for Policy Formulation

Taking into account long-standing traditions and trends affecting the heritage movement in Ontario, the following principles are proposed as guides to policy development. *They do not represent fixed government positions; rather, they are presented in the hope they will encourage public discussion.*

1. Value of Heritage Resources

The first and most critical assumption is that Ontario's natural and cultural heritage is an invaluable and irreplaceable resource to which all citizens of the province and their elected representatives have an important and ongoing commitment. There is indeed a **provincial interest** in heritage which recognizes it as an important economic resource, a source of information and experience in a post-industrial age, a key factor in ensuring the diversity of our natural and cultural environments, and a major force in the development of the shared values and common understandings necessary to social cohesion.

2. Integration into Social and Economic Life

Any policy, legislation or program related to the identification, protection, conservation, presentation and transmission of the province's heritage must strive to give it a function in the life of the community. Conservation must be understood to be fundamental to the social and economic life of the community and a key factor in the drafting of public policy. As one indication of such policy integration, heritage resources ought to be considered an important variable in all comprehensive government planning.

3. Reconciling Conflicting Interests

The preservation of heritage property in the province may result in circumstances where short-term individual interests conflict with the long-term interests of the community. Any heritage policy or legislation must have as a central goal the reconciling of these conflicting interests. The task must be to identify the proper balance between the rights and responsibilities of the private and the public sectors. This can best be achieved through a balancing of inducements and regulations—"carrots and sticks"—pertaining to heritage resources. Hindrances to conservation and rehabilitation of heritage resources must be identified and corrected.

4. Decentralization, Rationalization, and Partnerships

Recognizing the progress made in the past, there is a need to ensure that future policy, legislation and programs reflect the most efficient sharing of responsibilities. Decisions related to the division of heritage conservation responsibilities should be guided by the following assumptions: services and activities should be undertaken at the administrative level at which they can be carried out most effective—locally whenever possible; tools are needed to ensure maximum involvement and support from the private sector; new coordinating mechanisms are required to link players in both the public and private sectors. The provincial role in this system should be one of support, leadership, facilitation and the establishment of the context within which private enterprise and private citizens can cooperate in the achievement of public goals.

5. Excellence and Innovation

Given the rapidly evolving conservation movement, policy and programs must be designed to foster excellence and innovation. We must continue our commitment to the development of the skills and expertise of individuals—paid or unpaid—involved in conservation activities. We must anticipate and plan for the future rather than merely reacting to change. Mechanisms to ensure coordination and communication among all the players may be effective vehicles for anticipating and dealing with changing circumstances and new challenges.

6. Public Awareness

Energy and resources must be directed towards the development of tools and strategies needed to foster increased awareness and involvement in heritage conservation in Ontario. Any legislative or program changes will have limited impact without a change in the level of awareness on the part of both public officials and citizens generally, regarding the value of heritage resources and their responsibility to future generations.

The Ministry of Citizenship and Culture invites your input and assistance in charting a future course for heritage conservation efforts in Ontario through attendance and participation in the public consultation process.

APPENDIX B

Summary of Proposed Amendments to the Ontario Heritage Act

APPENDIX B

Summary of Proposed Amendments to the Ontario Heritage Act

Over the last ten years, the Ontario Heritage Act has been the subject of considerable scrutiny and numerous proposals for amendment. In addition, many respondents to the Ontario Heritage Policy Review submitted new recommendations for legislative change and amendment. Some of these addressed procedural questions and suggested ways to improve administrative processes and clarify long-standing inconsistencies within the Act. Others pointed to policy matters, where legislative changes may affect the division of responsibilities and the authority to act under certain circumstances. A third area of concern was the degree of consistency between the Ontario Heritage Act and other provincial statutes such as the Planning Act and the Building Code.

This Appendix summarizes the specific proposals made in the public submissions that fall under the first category described above; that is, "housekeeping" or procedural amendments. This does not constitute a comprehensive list of possible changes to the Act, but will provide an important reference point for the legislative review currently underway by the Ministry of Culture and Communications.

In addition, some of the more critical policy questions, for which legislative solutions have been recommended, are briefly outlined. These are discussed in more detail throughout the body of the report.

It should be noted that this Appendix, like the report itself, is a descriptive summary of proposals made in the public submissions. It does not constitute a statement of government policy or position.

ONTARIO HERITAGE ACT

- Section 1: Definitions -

Definition of "to alter" (Section 1(a))

In Section 1(a), it was proposed that the definition of the term "to alter" should be expanded to include references to the making of an addition and the carrying out of new construction. It was noted that the section begins by stating that "alter" means "to change in any manner", it goes on in a seemingly more limiting way to say that to alter includes "to restore, renovate, repair or disturb". To make an addition to a building or to carry out new construction on a property are not specifically mentioned, and there was some question as to whether these activities can be controlled (by Section 33) on property designated under Part IV. Part V, on the other hand, does mention the word "erect" in Section 42, in addition to the word "alter".

It was further suggested that the definition of "to alter" should be expanded to make specific reference to such changes as cleaning, stuccoeing and painting buildings, and consideration should be given to methods of controlling these changes. At present, the alterations reviewed under the Act are primarily those for which building permits are required. No such permit is required for sandblasting, for example, and yet this action might well have a harmful effect on the designated building.

- Part IV: Individual Building Designation -

Notice of Intention to Designate or Repeal a By-law (Sections 29(4) and 31(4))

It was suggested that the required information on the notices of intent to designate and to repeal, under Sections 29(4)(a-b) and 31(4)(a-b), respectively should be limited to the location and general description of the property, with details as to where inquiries for further information should be directed.

Section 29(4)(c) should be amended to require that the notice of intention to designate contain a statement that the notice of objection must set out the reasons for the objection. Section 31(4)(c) should be similarly amended.

Section 29(5) of the Act does state that the reasons for the objection must be set out in the notice of objection, but an owner would not know that if (s)he had not seen a copy of the Act. Putting this information in the notice of intention was suggested in an attempt to reduce the number of invalid notices of objection, since such notices require staff time to rectify. (It was also recommended that the Province develop a model objection form).

Reasons for Designation (Section 29(6) and 29(14))

The information required to be included in the reason for designation should be defined. It was felt that there is a great opportunity for legal dispute unless very specific parts or details of a building including colours, materials, finishes and form are specifically mentioned both for the interior and the exterior.

Withdrawal of Objection to Designation (Section 29(7))

Section 29(7) should be amended to allow that a Conservation Review Board hearing should not held be if a notice of objection is removed or if a municipality withdraws its notice of intention to designate; and, that in such cases the Board should notify all interested parties involved.

This amendment was suggested to reduce unnecessary expenses such as advertising and bringing Conservation Review Board members together to hold a hearing on an objection that has been withdrawn.

It was further recommended that the Conservation Review Board be given the authority to levy and collect costs from objectors who do not appear and from those presenting "frivolous" objections.

Responsibility for Notices of Conservation Review Board Hearings of Objections (Section 29(9))

It was recommended that Section 29(9) be amended to indicate who is to publish the notice of Conservation Review Board hearing on an objection to designation. It would be preferable if the Conservation Review Board were named as the body responsible for publishing the notice. In practice they have undertaken this responsibility to date.

The section should be amended further to require that some authority, preferably the Conservation Review Board, serve a notice of hearing on the owner, on the person making the objection, on the Clerk of the municipality, and on the Local Architectural Conservation Advisory Committee or its equivalent if one exists. To date the Conservation Review Board has served such a notice although it is not stipulated by the Act.

The reason for these amendments is to clarify who is to publish the newspaper notice, and to ensure that the owner and others are notified by mail, since the newspaper notices are seldom seen by the affected parties.

Applications for Permits Initiated Prior to Designation (Section 30)

Section 30 might be modified to provide that any permit application which has been made, but not fully processed and issued prior to the publication of the notice of intention to designate, is void and that a new application must be made under the Heritage Act.

This amendment would also ensure that applications processed but not picked up by the applicant before the designation would be void.

Responsibility for Notices of Conservation Review Board Hearings on Repeals (Section 32(5))

It was proposed that this section be amended to make the Conservation Review Board, rather than the local council, responsible for publishing the notice of hearing of an application for repeal of the by-law designating a property.

This amendment was suggested so that the same procedure is followed for advertising all hearings of the Conservation Review Board (see recommendations regarding Section 29(9)).

Responsibility of Tenants (Section 33(1))

Section 33(1) should be amended to require that tenants and other persons, as well as owners, shall not alter a designated property or permit its alteration without Council's consent.

This amendment was proposed to make tenants and others equally responsible for the preservation of designated buildings as owners and to make them subject to the same penalties as owners under Part VII , Section 69(1)(b) and (c).

It was also recommended that consideration be given under Section 33 to require an owner or tenant to apply to Council for a permit for alterations (as defined in more specific terms) even if such a building permit would not normally be required for such work. Cost should be minimal so that would not be a negative factor.

It was further recommended that the owner of a designated building be required to consult the LACAC, whenever any alteration that affected the reason for designation was being considered, in order to ensure that the alteration would not have a detrimental effect on the structure.

It was also recommended that Section 33 be amended to require an inspection by a qualified professional after an alteration is completed. The Ontario Building Code requires inspection by an architect or an engineer of all construction as defined in the Code. It would be worthwhile for the Heritage Act to require similar professional inspection of alterations to designated buildings in order to ensure implementation of the approved drawings and detail of construction.

Notice of Receipt of Application to Demolish (Section 34(1))

A new section following Section 34(1) should be inserted to require Council to issue a notice of receipt of an application to demolish within seven days of receipt of a complete and proper application. (A notice of receipt of an application to alter is provided for in Section 33(3)).

The reasons for this proposed amendment were that Section 34(3) requires Council to notify the applicant of its decision within 90 days after the "Notice of Receipt" is served on the applicant, yet the Act as currently worded does not require such a notice of receipt to be issued.

This amendment would also make the procedure for dealing with applications for demolition comparable to that for alterations.

Ninety-Day period to Follow Notice of Receipt (Section 34(2))

Section 34(2) should be amended, in conjunction with the amendment to be inserted after Section 34(1), to require Council to consider the application within 90 days of the notice of receipt rather than within 90 days of receipt.

The purpose of this proposed amendment was to make the procedure for dealing with application for demolition the same as that dealing with applications for alteration under Section 33(4), in order to avoid unnecessary complexity.

Control Over Demolition (Section 34(2)(b))

It was suggested that Section 34(2)(b) should be amended to allow the Council to refuse an application for demolition for up to 180 days from the date of its decision, rather than a full 180 days.

The reason for this suggestion was that in certain circumstances it may not be necessary to delay an application for a full 180 days. For example, a delay in order to meet with an owner might be beneficial. But if after the meeting the owner was intent upon demolishing a designated building, it might be preferable to proceed with demolition rather than wait the remaining number of days, perhaps with the building deteriorating. The amendment would allow Council flexibility to require a shorter delay rather than having to deal with an "all or nothing" situation.

- Part V: Heritage Conservation Districts -

Numerous recommendations were made to clarify and simplify the designation process for heritage conservation districts. These included the following:

Designation of Individual Buildings (Section 41(2))

Section 41(2) should be amended to allow a municipality to designate an individual building within a heritage conservation district.

Timing of Heritage Conservation District Controls (Section 41(3))

Section 41(3) should be amended so that a by-law designating an area as a heritage conservation district would come into effect as soon as it was passed by Council, rather than when the Ontario Municipal Board issued its formal order.

The reasons for this amendment were to make heritage conservation district designation (Part V) comparable in timing of its effectiveness to individual building designation (Part IV). The latter, in accordance with Section 30, takes effect at the beginning of the designation process (when a notice of intention is served) rather than at the very end of the process (when the O.M.B. issues its formal order). It was noted that one of the reasons Part V district designation has not been used widely is that it appears to be extremely cumbersome by comparison with Part IV.

Section 41 should be further amended to require that a municipality publish a notice stating it has approved a Heritage Conservation District Plan and that objections thereto must be received within 60 days of the publication of the notice (see recommendations regarding Section 41(8)).

It was also observed that if an area is designated as "an area to be examined for future designation", a holding by-law should be passed to prevent undesirable change while the area is being studied. To date it has not been possible to find the authority for a municipality to pass such a holding by-law if such authority exists, but it would appear that Part V of the Ontario Heritage Act should be amended to include such a provision.

Ontario Municipal Board Hearings (Section 41(6))

Section 41(6) should be amended to remove the need for an Ontario Municipal Board hearing where there is no objection to district designation.

Application to Ontario Municipal Board (Section 41(8))

Section 41(8) should be amended to allow a Council at least 30 and preferably 60 days to apply to the Ontario Municipal Board for approval of a by-law designating an area as a heritage conservation district.

It would appear that 14 days could be an unrealistically short time to complete an application to the Ontario Municipal Board, particularly the when failure to make application within the specified time means automatic repeal.

Consultation with LACACs on Applications in Heritage Conservation Districts (Section 43(2))

Section 43(2) should be amended to require Council to consult with its local advisory committee, where one is established, before considering an application for a permit to erect, demolish, or externally alter a building in the heritage conservation district.

The amendment was suggested in order to correct what appears to have been an oversight, so that applications under Part V are dealt with in the same manner as those in Part IV (Sections 33(4) and 34(2)). Section 28 in Part IV says the LACAC should advise on all matters relating to Parts IV and V, but Part V should mention it again to make it clear.

Section 43(2) should be further modified to require Council to issue a notice of receipt of an application and to deal with the application within 90 days of the notice of receipt, rather than within 90 days of receipt.

This recommendation was made in order to have all applications, whether under Part IV or Part V, dealt with in a similar manner.

Part V should be further expanded to include procedures for the amendment of design and non-land use policies during the life of a Heritage Conservation District Plan. (It was further recommended that a model by-law dealing with the establishment and adoption of policies for a Heritage Conservation District Plan be developed by the Ministry of Culture and Communications.)

- Part VII: General -

Number of Published Notices (Section 67(3))

It was proposed that Section 67(3) be amended so that any notice required to be published in a newspaper should be published in that newspaper only once, rather than three times.

The amendment was suggested to reduce the excessive costs to a municipality, particularly since experience has shown that many, if not the majority of people affected never see the advertisement at all, even when it appears three times.

Corporations (Section 69(2))

It was recommended that Section 69(2) should be amended to increase the maximum penalty for an offence under the Act by a corporation. (It was suggested that an appropriate maximum fine would be $250,000).

Recovery of Restoration Costs (Section 69(5))

It was suggested that Section 69(5) should be amended to include Parts V and VI of the Act.

POLICY MATTERS AFFECTING THE OHA AND RELATED STATUTES

- **Definition of Heritage Resources**

As a formal means of broadening the definition of heritage, it was widely proposed that the Act should take into account other heritage resources such as landscape features, natural areas, open spaces and parks, and areas of archaeological interest as candidates for designation by municipalities. This would also have implications for extending the mandate of LACACs to advise on such other matters.

- **Designation by the Province**

A section on designation by the Province was proposed for insertion in Part IV of the Act. Matters arising under this proposal included the question of responsibility for heritage resources in unorganized territories; whether the Province should be able to substitute itself for a municipality in order to designate properties under certain circumstances; and whether the Province should designate only those properties and sites of provincial or federal heritage significance, or those owned by the Crown.

- **Designation of Provincially and Federally Owned Properties**

It was widely proposed that municipalities be given the authority to designate structures and sites owned by the Province. The Province was also urged to seek federal cooperation to allow for the designation of federally owned properties.

- **Control over Demolition**

Proposals included measures in the Act to delay demolition for a longer period -- along the lines of that for residential buildings under the Planning Act -- or to prohibit demolition of certain designated buildings.

- **Appeals**

Many felt that appeals from municipal decisions regarding designation (including appeals from those favouring designation) should be heard by a body more like the Ontario Municipal Board than the Conservation Review Board, whose decisions would be binding upon a municipality.

- **Prosecution**

Various proposals included deleting Section 69(3) requiring the Minister to initiate legal proceedings, and empowering local enforcement officers to lay charges under the Act.

- **Related Provincial Legislation**

Various recommendations called for amending Provincial legislation to accommodate the special requirements of heritage conservation and to provide for a more consistent provincial approach. The most important statutes included the Planning Act, Building Code, Fire Code, Assessment Act, Liquor Licensing Board Regulations, Nursing Homes Act, Pits and Quarries Control Act and the Education Act.

- **Provincial Policies**

It was widely recommended that the Ministry of Culture and Communications should, as part of the review, develop policies for the protection of features of significant natural, architectural, historical and archaeological interest as defined in Section 2(6) of the Planning Act and as authorized under Section 3, so that decisions under the Planning Act will have a clear framework within which to to be made.

APPENDIX C

Public Meeting Schedule

CITIES	DATES
KINGSTON	Mon., May 4
BELLEVILLE	Tues., May 5
PETERBOROUGH	Thurs., May 7
OAKVILLE	Tues., May 12
HAMILTON	Wed., May 13
OWEN SOUND	Thurs., May 14
BRAMPTON	Tues., May 19
TORONTO	Wed., May 20
WATERLOO	Thurs., May 21
CORNWALL	Mon., May 25
OTTAWA	Tues., May 26

CITIES	DATES
GODERICH	Wed., May 27
WINDSOR	Thurs., May 28
LONDON	Tues., June 2
AURORA	Wed., June 3
NIAGARA ON THE LAKE	Thurs., June 4
RENFREW	Tues., June 9
NORTH BAY	Wed., June 10
SUDBURY	Thurs., June 11
GRAVENHURST	Mon., June 15
MIDHURST	Tues., June 16
TIMMINS	Wed., June 17
SAULT STE. MARIE	Thurs., June 18
HEARST	Mon., June 22
THUNDER BAY	Wed., June 24
KENORA	Thurs., June 25

APPENDIX D

List of Respondents

List of Submissions to the Ontario Heritage Policy Review (as at December 31, 1987)

PROVINCIAL ASSOCIATIONS

1. Architectural Conservancy of Ontario

    -Ontario Council
    Mr. Spencer Higgins, Review Chairman
    Mrs. Donna Baker, President
    Mr. Howard Walker, Past President

    -Brant County Branch
    Alan Scott, President
    Audrey Scott, Executive Secretary

2. Association of Municipalities of Ontario

3. Conservation Council of Ontario
Glenn D. Harrington, President

4. Federation of Ontario Naturalists
Don Huff, Environmental Conservation Director

5. Multicultural History Society of Ontario
Jean Burnet, Chairman and Chief Executive Officer

6. Natural Heritage League
Frank Shaw, Acting Chairman
Coordinating Committee

7. Ontario Archaeological Society (Inc.)
Christine Caroppo, President

    -London Chapter
    Michael Gibbs, Chairman, Chapter Initiatives Committee
    Neal Ferris, President

    -Thunder Bay Chapter
    Frances Duke, President

    -Windsor Chapter
    Rosemarie Denunzio, President

8. Ontario Association of Art Galleries
Michael Burtch, President

9. Ontario Association of Landscape Architects
Ed Fife, President

10. Ontario Black History Society
Glace W. Lawrence, Executive Director

11. Ontario Council of Archaeology
William D. Finlayson, Ph.D., President

12. Ontario Council of Professional Osteologists
Shelley R. Saunders, Ph.D.,
Associate Professor and Chairman

13. Ontario Folk Dance Association
Miss R. Ostrower

14. Ontario Folklife Centre
Carole H. Carpenter, Ph.D., President

15. Ontario Genealogical Society
Mrs. Marjorie Simmons, Compiler

    -Kawartha Branch
    William D. Amell, Research Director

    -Region IV
    Robert R. Halfyard, Director

    -Whitby-Oshawa Branch
    Mrs. Catherine Pickard, Cemetery Coordinator

16. Ontario Historical Society
Dr. Douglas Leighton, President

17. Ontario Marine Heritage Committee
Arthur Amos, Liaison Officer

18. Save Ontario Shipwrecks
Tim Legate, Vice-President

NATIONAL/INTERNATIONAL ASSOCIATIONS

1. Associated Designers of Canada
   Peter McKinnon

2. Canadian Institute of Public Real Estate Companies
   Bernard Ghert, President

3. Canadian Theatre Critics Association
   Herbert Whittaker

4. Coalition For Arts Heritage Preservation
   Clare Mazzoleni Piller

5. Folklore Studies Association of Canada
   K.F. Stone, President

6. International Council on Monuments and Sites
   Abdelaziz Daoulatli, Secretary-General

7. International Institute for Conservation of
   Historic and Artistic Works - Canadian Group

PROVINCIAL/FEDERAL AGENCIES

1. Art Gallery of Ontario
   William J. Withrow, Director

2. National Museum of Science & Technology
   D.G. Rider, A/Asst. Director, Collections & Research

3. Niagara Escarpment Commission
   G.H.U. Bayly, Chairman

4. Ontario Arts Council (TKO Committee)
   Barbara Ivey, Chair

5. Ontario Place Corporation, H.M.C.S. HAIDA
   CDR Robert A Willson, RCN, Ret'd

6. Royal Botanical Gardens
   A.P. Paterson, Director

7. St. Lawrence Parks Commission

   - Fairfield Historical Park
     Barbara Snyder, Supervisor

   - Fort Henry
     S.D. Mecredy, Supervisor Military Museums

   - Upper Canada Village
     W.J. Patterson, Former Superintendent of
     Historic Sites

MUNICIPALITIES

1. City of Brampton
   Community Services Department
   Henry Verschuren, Superintendent of Parks

2. Town of Goderich
   Recreation and Community Centre Board
   -Jane Netzke, Director of Recreation
   -Patricia Hamilton, Cultural Chairman

3. Regional Municipality of Hamilton-Wentworth
   Planning and Development Department
   Victor Abraham, M.C.I.P., Director of Local Planning

4. Town of Kapuskasing
   Administration Office

5. Township of King
   William Foran, Councillor Ward IV

6. City of Kingston
   Mrs. Marion Rodgers, City Clerk

7. City of London
   K.W. Sadler, City Clerk

8. City of Mississauga
   Recreation and Parks Department
   -Mary Lou Evans, Historian-Curator
   -Terence L. Julian, City Clerk

9. Town of Niagara-on-the-Lake (Includes LACAC Brief)
   J.D. Coward, Town Planner

10. Township of North Monaghan
    Mrs. Irma Richardson, Clerk/Treasurer

11. Town of Oakville (Includes LACAC Brief)
    Cathie L. Best, Deputy Clerk

12. Regional Municipality of Peel
    Larry Button, Regional Clerk

13. County of Peterborough
    W.D. Armstrong, Administrator, Clerk-Treasurer

14. City of Waterloo
    L.J. Ayers, Deputy City Clerk

15. City of Windsor
    Thomas Lynd, City Clerk

LOCAL ARCHITECTURAL CONSERVATION ADVISORY COMMITTEES

1. Amherstburg LACAC
   Reg. A. Cozens, Chairman

2. Aurora Heritage Committee (LACAC)
   G.L. Oliver, Vice Chairman

3. Brampton Heritage Board (LACAC)
   -Colin Campbell, Chairman
   -Wilma Allison, Treasurer

4. Caledon Heritage Committee
   Heather R. Broadbent, Chairman

5. Heritage Cornwall (LACAC)
   Dennis Carter-Edwards, Chairman

6. Heritage East Gwillimbury (LACAC)
   J.A. Lennox Brown, Chairman

7. Flamborough LACAC
   Mrs. Allan S. Kennedy, Chairman

8. Gravenhurst LACAC
   Sylvia M. Purdon, Chair

9. Guelph LACAC
   J. Allan Snowie, Chairman

10. Hamilton Township LACAC
    Don Mikel, Chairman

11. Hamilton LACAC
    David Godley, Manager
    Neighbourhood Section

12. Heritage Huntsville
    Mrs. Maureen Hunt, Chairman

13. Millbrook LACAC
    David Tong, Treasurer

14. Newmarket LACAC

15. Ottawa LACAC

16. Parry Sound LACAC
    Rebecca Johnson, Historical Intern

17. Heritage Penetanguishene (LACAC)
    Wilfred Guthrie Jr., Secretary

18. Peterborough Architectural Conservation Advisory
    Committee (PACAC)
    Mary Thomas, Chairman

19. Township of Pittsburgh LACAC
    W.H.T. Wilson, Chairman

20. Twp. of Rear of Leeds and Lansdowne
    A.W. Shaw, Chairman

21. Sault Ste. Marie LACAC

22. Thunder Bay LACAC
    William Ross, Chairman

23. Toronto Historical Board
    R. Scott James, Managing Director

24. Victoria Harbor LACAC
    Catharine Mackenzie, Chairman

25. Heritage Walkerton (LACAC)
    Dale E.A. Wilson, Executive Secretary-Treasurer

26. Waterloo LACAC
    David White, Chairman

27. City of Welland LACAC Committee
    Betty A. DiMartile, Chairman

28. Windsor Architectural Advisory Committee
    G. Maycock, Secretary

29. Woolwich Township LACAC
    Arthur H. Gorman, Chairman

LOCAL HISTORICAL SOCIETIES

1. Brant Historical Society
   Lillian Montour, President

2. Hastings County Historical Society

3. Madoc Historical Foundation

4. Mono Mills And District Historical Society
   Jack Brooksbank, President Elect

5. Niagara Historical Society
   Nancy Butler, President

6. Societe Historique du Nipissing
   Laurette Labouret, Presidente sortante

7. North Lanark Historical Society
   Frances McLean, President

8. North York Historical Society
   Penelope L. Potter, President

9. Peterborough Historical Society
   Robert Bowley, First Vice-President

10. Historical Society of St. Catharines
    Gregory John Miller, President

11. Seventh Town Historical Society
    John E. Wannamaker, Secretary Treasurer

LOCAL HERITAGE ORGANIZATIONS

1. Community History Project of Ward 5, City of Toronto
   Mr. Gyuszi Berki, Secretary-Treasurer

2. Harrow Early Immigrant Research Society
   Edith J. Woodbridge, President

3. Heritage Ottawa
   Mark Denhez, President

4. Heritage Parry Sound
   Ray Smith

5. Heritage Trek VI
   T.W. Robinson, Publicity Chairman

6. The Niagara Foundation
   G.R. Wooll, President

7. Prescott Main Street Canada Office
   John Quinn, Coordinator

8. United Empire Loyalists' Association of Canada

   -Bicentennial Branch, Amherstburg
   Gwen Overholt, Loyalist
   Jean Walton, President

   -Bicentennial Branch, Kingsville
   Jean Walton, President

   -Kawartha Branch
   Jean I. Lake, Vice-President

9. Waterloo Regional Heritage Foundation
   Mrs. Jean Haalboom, Chairman

ARCHIVES

1. Althea Douglas Consultants
   Mrs. Althea Douglas
2. *Archivaria*
   Bruce Wilson
3. Congregation de Notre Dame
   Sister Helen Cawley, C.N.D., Provincial Archivist
4. Eastern Ontario Archivists Association
   Paulette Dozois, President
5. Huguenot Society of Canada
   Jean du Val Brochet, Archivist
6. Incorporated Synod of the Diocese of Ontario
   Shirley C. Spragge, Diocesan Archivist
7. Metropolitan Separate School Board
   -Judy Smith, Supervisor of Library Services
   -Mark Sebanc, Archivist/Librarian
8. Paul McIlroy, Archivist, Nipissing Archives
9. Norwich & District Archives
   Joyce A. Pettigrew, Archivist
10. Orillia Public Library
    Katherine McKinnon, Chief Executive Officer
11. Queen's University Archives
    Mrs. D.F.McDermaid, University Archivist
12. St. Catharines Public Library
    Ms. Christel Haeck, Special Collections
13. Sisters of St. Joseph Archives
    Sister Mary Trimble
14. Southwestern Ontario Archivists Association
    Mark Walsh, Past President

ARTS HERITAGE

1. Art Gallery of Peterborough
   Thomas H. Robinson, President
   Board of Directors
2. Canadian Opera Company
   Mrs. Joan Baillie, Archivist
3. London Regional Art Gallery
4. Oakville Galleries
   Arlene Kennedy, Director

MUSEUMS - COMMUNITY

1. Ameliasburgh Historical Museum
   Marion Casson, Curator
2. Atikokan Centennial Museum & Historical Park
   Sandra Nash
3. Black River-Matheson Museum
   Thelma Miles, Director-Curator
4. Kirkland Lake Museum
   M. June Korhonen, Chairman of the Board
5. Lambton Heritage Museum
   Bob Tremain, Director/Curator
6. Lennox and Addington County Museum
   Jane Foster, Director
7. London Historical Museums
   Peter Van der Westen, Chairman
   London Public Library Board
8. City of Nanticoke Museum Board
   Rita Kalmbach,
9. Museum of Northern History
   The Sir Harry Oakes Chateau
   Mrs. Carolyn O'Neil, Director/Curator
10. Region of Peel Museum Board
    George Waters, Chairman
11. Sault Ste. Marie Museum
    Elizabeth B. Allaway, Executive Director
12. Welland Historical Museum
    George Chipman, Chairman
    Board of Directors
13. West Parry Sound District Museum
    Peter McVey, Director/Curator
14. Woodstock Museum
    Sheila A. Johnson, Curator

MUSEUMS - SPECIALIZED

1. Huronia Museum
   Huron Indian Village
   James Hunter, Director
2. Mississippi Valley Textile Museum
   -Diane Duncan, Museum Manager
   -Herb Pragnell, President
3. Museum of Promotional Arts
   Miss Frances E.M. Johnston, President and
   Chief Executive Officer
4. Northwestern Ontario Sports Hall of Fame
   Diane Imrie, Administrator
5. Orval Berry Museum
   Orval Berry
6. Royal Hamilton Light Infantry Heritage Museum
   -C. Beynon, Chief Curator
   -Catherine Giudice, Assistant Curator

MUSEUMS - HISTORIC SITES/HOUSES

1. Allan Macpherson House and Park
   Susan Woodend, Director
2. Century Village
   Dr. Margaret MacKelvie, Curator
3. Hon. William Allan House
   -John Graaskamp
   -Helen Helie
   -Leonard Hexemer
   -Margaret Hexemer

MUSEUMS - ASSOCIATIONS/SOCIETIES/NETWORKS

1. Museums of Niagara Association (M.O.N.A.)
   Jane Davies, Chairperson
2. Peterborough Heritage Information Network (PHIN)
   Dorette Carter, Secretary-Treasurer
3. Thunder Bay Historical Museum Society
   Gerrie Noble, Director

ARCHAEOLOGY

1. David Arthurs, Thunder Bay
2. Association of Iroquois and Allied Indians
   Chief Harry Doxtater, President
3. Ian D. Brindle, Brock University
4. Cataraqui Archaeological Research Foundation
5. William D. Finlayson, Ilderton
6. Marilyn MacKellar, Toronto
7. Charles O. Nixon, Ayr
8. Oneida Council of the Thames
   A. Paul Antone, Manager
   Oneida Archaeological Project
9. Mr. Timothy John Orlik, Niagara-on-the-Lake
10. James Pengelly, Port Colborne
11. Dr. S. Pfeiffer, University of Guelph
12. Preserve Our Wrecks Kingston
    Susan M. Bazely, President
13. Peter R. Ramsden, Ph.D., McMaster University
14. Marianne P. Stopp, Waterloo
15. Gary Warrick, Toronto
16. Anon.

NATURAL HERITAGE

1. Coalition on the Niagara Escarpment (C.O.N.E.)
   Lyn MacMillan
2. Long Point Region Conservation Authority
   J.L. Oliver, General Manager
3. Dr. Paul Eagles, University of Waterloo
4. Norfolk Field Naturalists
   Arthur N. Langford, Vice-President (Environment)
5. Stewart Hilts, University of Guelph
6. McIlwraith Field Naturalists of London Ontario Inc.
   James W. Rule, 1st Vice-President
7. John H. Pierce, Niagara-on-the-Lake
8. Toronto Field Naturalists
   Phil Joiner, President
9. Society for the Preservation of Natural History Collections
   Daniel J. Faber, Ph.D., President
10. Andrew Stewart, Toronto
    Kathryn Mills, Toronto

NON PHYSICAL HERITAGE

1. L'Association canadienne-francaise de l'Ontario
   Pierre Davis, President
2. Elliette M. Auger, Sudbury
3. Lucie Beaupre, Sudbury
4. Lucienne Bergeron, Sudbury
5. Canadian Slovak League
   Mrs. Margaret T. Hudak
6. Valmore Cazabon, Verner
7. Centre franco-ontarien de folklore
   Germain Lemieux, s.j., Directeur
8. Gabrielle Cholette, Sudbury
9. Club Richelieu
   Normand D. Vallee, President
10. Federation of Danish Associations in Canada
    Rolf Buschardt Christensen
11. India-Canada Association
    George K. Chacko, President
12. Institut franco-ontarien
    Benoit Cazabon, Directeur
13. Juliette Lavoie-Gaboury, Sudbury
14. Hermance Morisset, Sudbury
15. Paroisse Saint-Dominique
    Mgr Jean-Marie Paiement, PH
16. Luc Robert, Sudbury
17. Lynn Roussel, Sudbury
18. Sr. St. Maurice s.c.o., Sudbury
19. Normand Sauve, Sudbury
20. Pauline Stewart, Sudbury
21. Mac Swackhammer, Welland
22. Andre Touchette, Chelmsford
23. Laurianne Valiquette, Sudbury
24. John Valiquette, Sudbury
25. Floriant Venne, Sudbury
26. Gisele Vezina s.c.o., Sudbury

INDIVIDUALS, FIRMS, AND OTHER ASSOCIATIONS

1. Christopher Andreae, Historica Research Ltd., London
2. Fred H. Armstrong, University of Western Ontario
3. Julia Beck, London
4. Gordon Bellerby, Niagara-on-the-Lake
5. A.G. Brunger, Trent University
6. Donna Campbell, Toronto
7. Colin E. Chaplin, Belleville
8. Jeri Danyleyko, Toronto
9. R.M. Davis, Niagara-on-the-Lake
10. Denis Dion, Universite de Sudbury
11. Lynne D. DiStefano, Ph.D., Brescia College
12. Keith Dunnet, Producer; Gerry Ouderkirk, Co-Producer Through The Lens, Inc., Oakville
13. Alec J. Hartill, Hartill Art Associates, London
14. Donald D. Fox, Oshawa
15. Mrs. Marion W. Garland, Port Hope
16. David Harris, Heritage Christian School, Hamilton
17. Mrs. A.M. Henderson, Bruce Mines
18. Paul Hertel, Amherstburg
19. William E. Hitchins, London
20. Judith A.W. Hughes, Carleton Place
21. Colleen M. Kelly, Newmarket
22. Kathleen Kelso, Trent University
23. Lois Love, Kingston
24. Floyd MacIntyre, Forest
25. Madeline Malott, Kingsville
26. John Marsh, Trent University
27. Patricia McHugh, Patricia McHugh Publishing Services, Toronto
28. Thomas McIlwraith, Mississauga
29. Robert N. Morris, Goderich
30. Sheila Murray, BLA, MLA, University of Guelph
31. Miss Gwendolyn Overholt, Amherstburg
32. Barbara Paterson, Huntsville
33. John W. Pollock, Ph.D., Settlement Surveys Ltd., New Liskeard
34. K.G. Pryke, University of Windsor
35. David W. Rupp, Brock University
36. Mary B. Stedman, Brantford
37. Ruth Stedman
38. J.R. Tennyson, James R. Tennyson Certified Piano Technician, Toronto
39. David Thomson, Landscape Architect, London
40. Bruce Tomlinson, Ignace
41. Brian D. Treble, Goderich
42. Waterloo County Women Teachers' Association
43. Ian Wheal, Toronto

APPENDIX E

List of MCC Regional Offices

LOCATION	CONSULTANTS	SUPPORT STAFF
	CENTRAL REGION	
TORONTO 10 St. Mary Street 2nd Floor M4Y 1P9	**Marek Brodzki, R.M.** Cathy Campbell Lisa Clark Huguette Jacobson* Momoh Kakulatombo* Elizabeth Lounsbury Jane Tymoshuk Glenn Court	**(416) 965-6597** Linda Rossi* Dorothy Ford Debbie Haulson Gloria Francis
BARRIE 114 Worsley Street L4M 1M1	Marlene Fairbrother*	**I.C. 847-737-0543** **1-800-461-4308 (AC 705)** Lucie Larin*
	EASTERN REGION	
OTTAWA Rideau Trust Building 11th Floor, Room 1102 1 Nicholas Street K1N 7B7	**Brian David, R.M.*** David Powell Jean-Yves Leduc* Denise Leroux* Georgette Houle*	**I.C. 821-566-3728** **1-800-267-1910 (AC 613)** Louise Page* Sharon Nobert*
BELLEVILLE 280 Pinnacle Street Suite 3 K8N 3B1	Diana Koechlin	**I.C. 827-968-3474** **1-800-267-0573 (AC 613)** Marjorie Dunlop
	NORTHERN REGION	
SUDBURY 200 Elm Street East 4th Floor P3C 5N3	**Diane Labelle Davey, R.M.*** Claude Faucon* t.b.a.	**I.C. 841-675-4383** **1-800-461-4025 (AC 705)** Diane Moore* Denise Monette*
DRYDEN 479 Government Road P8N 3B3	Gregory Chaput	**I.C.884-807-223-3331** Gerry Oliphant
SAULT STE. MARIE 3rd Floor, 390 Bay St. P6A 1X2	Paul Sabourin*	**I.C. 842-759-8652** **1-800-461-7284 (AC 705)** Annette Davey*
THUNDER BAY 1825 Arthur St. E. P7E 5N7	Ollie Sawchuk	**I.C. 844-475-1683** **1-800-465-6939 (AC 807)** Helen Urquhart
TIMMINS 22 Wilcox St., 2nd Fl. P4N 3K6	Robert Laforest*	**I.C. 882-705-267-8018** **ZENITH 98991 (AC 705)** Carole Faucher*

WESTERN REGION

HAMILTON 119 King St. W., 8th Fl. L8N 3Z9	**Ted Marunchak, R.M.** Karen Daniels Linda Langston	**I.C. 811-521-7229** **1-800-263-8514 (AC 416)** Heather Tournay Emma Rees
KITCHENER 30 Duke St. W., 4th Fl. N2H 3W5	Nancy Fallis	**I.C.815-578-8200** **1-800-265-2185 (AC 519)** Joy Kramer
LONDON 255 Dufferin Ave. 6th Fl. N6A 5K6	Judith Saunders Christine Troughton Laurie Caloren	**I.C. 813-679-7146** **1-800-265-4731 (AC 519)** Valerie Rimmer
ST. CATHARINES 15 Church St. Ste. 406 L2R 3B5	Susan Morrison*	**I.C. 819-685-7397** **1-800-263-5411 (AC 416)** Zenonia Fulham*
WINDSOR Duff-Baby House 221 Mill St. N9C 2R1	Marc Duval* John Fisher Linda Paquette*	**I.C. 814-256-5486** **1-800-265-5668 (AC 519)** John Shellhorn*

R.M. Regional Managers

* Bilingual